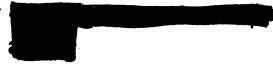


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P. 105

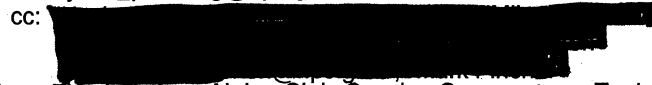


"Linda McMillan"



09/07/2006 05:47 PM
MST

To: <yose_planning@nps.gov>



Subject: The American Alpine Club: Scoping Comments on Tuolumne River & Meadows Plans/EIS

Dear Yosemite National Park Planners:

The American Alpine Club is pleased to offer our attached comments to the Tuolumne Wild and Scenic River Comprehensive Management Plan/Tuolumne Meadows Plan and EIS.

Respectfully submitted,

Linda McMillan, MBA

The American Alpine Club
Chairman, The Yosemite Committee

The International Mountaineering and Climbing Federation --UIAA
Member, Access and Conservation Committee



Enclosure: Comments document attached to this email message TuolumneRiver&MeadowsComments9-06.doc

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THE AMERICAN ALPINE CLUB

September 5, 2006

Michael Tollefson
Superintendent
Yosemite National Park
P. O. Box 577
Yosemite, CA 95389

Re: Tuolumne Wild and Scenic River Comprehensive Management Plan & Tuolumne Meadows Plan/ EIS Comments

The American Alpine Club (AAC) is pleased to provide public scoping comments on the proposed *Tuolumne Wild and Scenic River Comprehensive Management Plan & Tuolumne Meadows Plan/ EIS* (the Plans). Besides being America's oldest national climbing organization, we are also the one that represents several million people in the international climbing community (as part of the U.I.A.A.—the International Mountaineering and Climbing Federation). As you know, the national and international climbing communities are historic and important stakeholder groups in Yosemite National Park. Furthermore, we have particular interest in “the conservation and preservation of the mountain environment”, as this is a core part of the AAC's mission statement.

The Tuolumne River corridor and Tuolumne Meadows regions have significant importance to climbers in the US and abroad, as they provide access to an exceptional variety of opportunities for primitive, unconfined recreation, rustic camping, and backcountry excursions in the sub-alpine landscape dominated by spectacular natural scenery, clean and water, dark skies, and pristine soundscapes. The Plans being developed through this scoping process can have major impacts on climbers' enjoyment of and access to these regions. We therefore submit these comments to enable park planners to create viable and appropriate Plans for the Tuolumne River and Meadows regions of Yosemite National Park.

The Outstanding Remarkable Values we find there: Access to Unique Settings of Ice, Snow, Rock, and Water

Because of the high altitude of Tuolumne Meadows and the Tuolumne River, and their proximity to the large population centers of California and Nevada, climbers are drawn to the Outstanding Remarkable Values (ORVs) of the regions' snow and icefields which can be explored with skis, snowshoes, and mountaineering boots. This access offers spectacular mountaineering, ice climbing, ski mountaineering, mountain photography, and ski touring much of the year. In the warm months, for those climbing areas that are adjacent or close to the river, the sights and sounds of the river water as it flows along the granite slabs and meadow areas also contribute significantly to the special landscapes and soundscapes climbers cherish in the Tuolumne River and Meadows regions. A very significant ORV relating to the river and meadow regions is the special quality of the granite found in its domes and cliffs. Whereas Yosemite Valley is remarkable for its long, high-quality crack systems, the Tuolumne River and Meadows regions are equally notable for their soaring domes of exceptionally high-quality granite featuring large crystalline knobs, in-cut edges on eroded pockets in the glacier polish, and steep faces with safe, low-angle “walk-off” descents. We therefore are concerned about preserving for present and future

generations of climbers unconfined recreational access to these river and meadows regions to enjoy these unique ORVs throughout the year.

Other Values we cherish, and suggestions for these regions: Natural, Recreational, and Cultural

We feel the Plans should preserve the following important natural values of the Tuolumne River and Tuolumne Meadows regions which we cherish:

- Natural landscapes continually shaped by natural processes—wind, water, snow, ice, fire, etc.—not “the hand of man”
- Natural soundscapes. Particularly damaging noises are those created by customized/compromised exhaust mufflers on motorcycles, and from the use of electrical generators in campgrounds. We feel these are particularly invasive and annoying urban soundscape noises, not appropriate for these regions, and should be sharply curtailed by park management policies. They instantly destroy the most valuable and treasured resource these regions offer to people—the restorative feeling of being surrounded by wilderness.
- Dark skies at night. We believe that all park lighting should be shielded in ways to prevent “light pollution”, particularly in these regions. Motion-activated lighting should be used in all bathrooms and any other locations where lights need not be shining all night.
- High levels of preserved biological diversity, protected from encroachment by non-native species
- High levels of air quality
- High levels of water quality
- Ability of these sub-alpine regions to serve as a crucial haven for species migrations caused by climate changes

We feel the Plans should preserve the following recreational values of the Tuolumne River and Tuolumne Meadows regions which we cherish:

- Spontaneous access to unconfined recreation, year-round
- Exclusion of snowmobiles and other motorized winter recreational vehicles (except for public safety and park management purposes) in these regions to preserve air quality and natural soundscapes
- Preservation, and expansion wherever possible, of the number of rustic, low-impact/high density campsites available by reservation and spontaneous access (“first come-first served”). If any campsites need to be moved away from the river, an equivalent number of these “displaced campers” must be accommodated elsewhere in the campground area. This could most easily be accomplished by creating more high-density “walk-in” campsites in the campground. To ease the annual excess demand for campsites in these regions, the National Park Service should also prioritize allocated funds to all projects that can create more rustic, low-impact/high density campsites along the entire Tioga Road corridor, as suggested by the Out of Valley, Parkwide Campground Study of 2002.
- Preservation of the size and number of picnic areas, roadside turnouts, and roadside parking areas along the Tioga Road corridor. In weighing resource impacts versus values, the National Park Service should realize that picnic areas, roadside turnouts, and roadside parking areas are in fact tremendously valuable resources for visitors of all types. They allow people to pause their travels, rest, walk around, appreciate the scenery and fresh air, plus interact and learn from other visitors in spontaneous, serendipitous ways that can make their visit much more interesting, memorable, and safe. As climbers, we often have other visitors stop at these locations and ask us about our sport and the areas where we will climb. So these locations provide many visitors with valuable, unexpected, and personalized interpretive experiences while in the Park. Climbers also frequently provide driving directions or other park information to other visitors, so these locations also contribute to visitors’ overall safety and enjoyment while in the Park. In our conversations with visitors, we can also pass along important park stewardship tips and information to them, for instance, how to dispose of trash, cigarettes or recyclables that might otherwise end up on the

ground or in the water. For climbers and other recreationists, these picnic areas, roadside turnouts, and roadside parking areas allow them to gather, have a quick meal or snack, check their maps, make plans for recreational outings, AND provide important information to other recreationists and other visitors. Therefore, we feel preservation of the size and number of picnic areas, roadside turnouts, and roadside parking areas along the Tioga Road corridor recognizes the very important roles they play in benefiting park visitors and park management.

We feel the Plans should preserve the following cultural values of the Tuolumne River and Tuolumne Meadows regions which we cherish:

- Rustic, seasonal, soft-sided buildings should be retained for human infrastructure versus replacement with permanent structures. We favor preserving the seasonal, non-commercialized, rustic feeling of the Meadows Store and Grill area with its soft-sided buildings. These reinforce for visitors the clear sense that the purpose of these facilities is to serve as a minimalistic "Trailhead" or "Jumping off point" to explore the wilderness, NOT as a commercialized way-station nor as a retail shopping "destination".
- The level of human infrastructure present in these sensitive regions should retain the sense that natural landscapes, soundscapes, and processes dominate, while "the hand of Man" is small and seasonal in these special, vulnerable river and meadows regions
- Protection of indigenous animal populations by having sufficient animal-proof food lockers available at campsites and trailheads to especially promote effective bear management efforts throughout Yosemite National Park.
- Recycling should be strongly encouraged for all visitors and residents. Sufficient recycling bins should be available at campsites, picnic areas, and trailheads.
- Recycled or recyclable materials should be used for construction, infrastructure, and other needs whenever feasible.
- Energy efficiency should be incorporated into every part of the design and operation of human infrastructure in these regions.
- We favor closing the petrol station at the Meadows area and removing its underground fuel storage tanks. Although its existence is helpful to the few seasonal residents of these regions, most motorists along the Tioga Road are only in these regions for a few days or are just passing through to destinations to the east or west. Motorists are adequately served by a large petrol station and convenience store at Crane Flat to the west on the Tioga Road and by large, full-service stations in the eastern Sierra town of Lee Vining at the base of the Tioga Pass to the west. Removal will ensure that the water quality for visitors and the other biological species of these very sensitive regions will not be endangered by any leakage from underground chemical storage tanks at this facility.
- The portion of the petrol station building now devoted to petrol retailing could be very valuably used instead as a much-needed, sheltered "Depot" for people to buy tickets and wait for public transport such as the YARTS busses linking people to the eastern Sierra, Yosemite Valley, and the San Joaquin Valley, as well as for the popular free Park Shuttle busses serving some of the Tuolumne high country. The other part of that building could then still serve the visiting public as a small and valuable recreational equipment shop and as the summer location of the Yosemite Mountaineering School. We feel that the information, equipment and guidance visitors receive from staff at this shop and school represent an extremely valuable resource for the public. And it reinforces in the minds of the visiting public the important overall concept that this is where people prepare themselves to safely explore the spectacular wilderness spread out around them.
- We favor encouraging visitation to and around these regions via public transport by expanding the existing public transport systems. This will improve air and water quality, reduce the noise and disturbance of traffic, and increase opportunities for access to these regions by those without, or preferring not to use, private vehicles. This will be especially helpful to backpackers, climbers, and other recreationists who want to explore the regions one-way or "point-to-point", and avoid the need for parking private vehicles at each "point".

- We favor an expansion of the free Park Shuttle bus system that currently serves part of these regions. This free shuttle system now only operates from Tuolumne Meadows Lodge to Olmstead Point. We favor expansion of this system further west to the Tioga Pass entrance station. This would allow people who are camped in or visiting the adjacent Forest Service lands to take a free bus (after paying Park entrance fees if needed) to the Tuolumne Meadows and Tuolumne River regions without having to use a private vehicle. It could also serve the National Park Service staff who operate the Tioga Pass entrance station. This service would be especially attractive to recreationists like hikers, fishermen, climbers, and photographers who prefer to or need to (because of lack of available campsites) camp outside the Park but want to recreate or take photographs in the Park. It would also be of great value to all visitors during peak visitation days, as they could avoid waiting in long lines of vehicles for the chance to see and enjoy the Tuolumne regions.

By virtue of their geographic location, access, and unique beauty, the Tuolumne River and Tuolumne Meadows regions are among the most popular, valuable, and potentially vulnerable wilderness resources in the world. They deserve the best from land managers and the visiting public. We stand ready to help the National Park Service develop plans that will effectively preserve and protect these precious national treasures, so that generations to come can also benefit from what they teach us today: strength in the face of physical challenges, wonder, inspiration, and humility.

Respectfully submitted,



Linda McMillan
The American Alpine Club

Chairman of the Yosemite Committee
Member, UIAA Access and Conservation Commission



Greg Adair

09/12/2006 08:53 PM
PST

To: Mark_Butler@NPS.gov
cc: yose_planning@nps.gov
Subject: URGENT Request from Greg Adair / FOYV

RECEIVED
TWSR-300-EIS
SEP 07 2006

YOSEMITE NATIONAL PARK

Urgent Attention:
Mark Butler
NPS Planning Office
Yosemite National Park, CA

Mark:

I am writing with an *urgent* request. When submitting scoping comments for the Tuolumne plans last week, I mistakenly attached a legal memo which is protected by attorney client privilege. That memo was a PDF file, titled:

HSCs (SCLDF analysis 1993).pdf

Please be advised that I attached this memo inadvertently.

I had no legal authority to include it in the FOYV comment letter, or in any way to transmit it to you.

Please return the memo immediately. PLEASE ENSURE that all copies of the memo are DESTROYED, and REMOVED from your access or any other access.

Thank you very much for your help in this matter .

Greg Adair, for FOYV.

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Greg Adair

09/07/2006 08:21 PM
PST

To: yose_planning@nps.gov
cc: [REDACTED]
Subject: Tuolumne Scoping Letter

RECEIVED
TWSR-300-ELS
SEP 07 2006
P. 10718
YOSEMITE NATIONAL PARK

The Friends of Yosemite Valley submit the following scoping letter pursuant to NEPA:

Introduction:

We submit this comment letter with *fundamental objection* to the way this scoping process has been initiated this summer. Beyond a mere process concern, we think that scoping has been injected with such obvious prejudice regarding outcomes, that the public deserves additional time and a very different informational context in order to provide meaningful scoping comments, and in order for the Agency's to fulfill its legal responsibility under NEPA. Scoping for the Tuolumne CMP should be re-initiated at later date, when the lessons of the recent Merced rulings have been learned, and de-coupled from the Tuolumne DCP.

Part I, Process:

1) Scoping has been improperly narrowed:

The Tuolumne Wild and Scenic River Management Plan, at this early phase of scoping, has been made illegally narrow by suggesting openly and repeatedly to the public that the NPS will consider only one approach to addressing user capacity within the Tuolumne WSR Corridor: VERP. *This is nothing short of astonishing* in light of the District Court's holding that the 2005 Merced Plan was illegal, in part because it developed all alternatives from an approach which would give the same outcome (VERP). The ink is not dry on that decision, and the NPS is refusing to abide by its most basic direction. Moreover, while it might be helpful for us to enumerate the details of the ruling, and the mis-match of VERP to the requirements of a legally compliant WSRMP, this would be pointless. The ruling is publicly available. We suggest that the NPS needs to read the ruling and accept its instruction. The suggestion that scoping is not being conducted on the "settled" issue of capacity, in itself, makes the scoping process invalid.

2) We incorporate by reference our thoroughgoing critique of VERP as stated in prior NEPA comments, and court our briefs. NPS should create alternatives to VERP.

3) NPS should separate the Tuolumne River Plan from the Tuolumne Meadows Plan

The Tuolumne scoping process is flawed by simultaneous discussion of the Tuolumne CMP and the Tuolumne Meadows Concept Plan. The scoping being conducted today fatally confuses issues, narrows the scope, and prejudices outcomes. Sadly, this is an almost perfect parallel to the joining of the YVP and the Merced CMP in 2000, and will lead to the same disastrous result. FOYV incorporates by reference all of our prior criticism of this improper joining of the 2000 Plans, and the improper influence of the YVP on decision making for the CMP.

a. The Scoping for the Tuolumne DCP should happen separately from the scoping for the CMP. The Tuolumne CMP ROD should be signed before scoping for the DCP is even initiated. As a programmatic document, the Tuolumne River Plan should provide guidance with respect to

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the range of activities and resource areas and issues along the river corridor. Until the Tuolumne River Plan is finalized and the public knows what that "guidance" is, the public is prevented from offering meaningful scoping comments on the Tuolumne Meadows Plan

b. Again, we think the issues are identical to what they were in 2000. It is not fair, nor credible, to expect the general public to deal with two detailed planning mechanisms "as if" they were separate documents. The average member of the public will either misconstrue the issues of one for the other, or will provide scoping comments for one assuming the effective constraints of the other. As an implementation plan, the Tuolumne Meadows Plan should tier from the Tuolumne Rivers Plan. The latter should provide the zoning blueprint that will establish boundaries, classifications, user capacity and protection of the Outstandingly Remarkable Values.

c. As we have said, the WSRMP must be given precedence. The DCP should tier from the CMP. You must allow the public to speak to the Tuolumne DCP from the perspective of a legal, functioning WSRMP for the Tuolumne.

d. Capacity is a foundational issue which the public must understand in order to make any meaningful suggestion for the DCP under the scoping process. To discuss patterns of ongoing use, and plans for further use, with no plan in place to deal with capacity, will doom the protective aspects of any plan for the Tuolumne WSR.

4) Precedence should be give to completing the Merced CMP.

There is a sort of demonstration of bad faith in the current scoping process. The NPS has failed in its duty to prepare a legally adequate plan to protect the Merced WSR for 16 years. We believe it should demonstrate to both the District Court and Appellate Court that it intends to comply with the law, and meaningfully absorb the lessons and direction given by the Courts to the Agency on the Merced. The NPS needs to demonstrate its ability to treat the Tuolumne properly by completing a legally adequate Merced CMP. Priority should remain on the Merced. We note that Yosemite NP does not have the resources to conduct both of these major plans at the same time.

5) Scoping should be re-initiated.

Separate planning processes (CMP versus the DCP) would allow the NPS to articulate a detailed plan to protect and enhance the Tuolumne River's ORVs on a segment-wide basis, and articulate a numeric basis for user capacity which protects and enhances the values of the river (its ORVs). The NPS should produce a complete CMP before the planning process for the Tuolumne DCP begins. The scoping process for the Tuolumne WSR should be re-started under the assumptions suggested here.

Part II. Some Plan Issues:

We title this section "plan issues" intentionally. Which plan is it? We think nobody really knows at this point. This conceptual problem strikes at the core of the current process, and suggests that it is both unfair to the public and illegal. We incorporate our comment under "Part I", above. This notwithstanding, we offer the following observations on the confusingly interrelated plans, put forth so far by NPS.

1) DCP calling for prejudicial decisions on capacity and use of the Tuolumne WSR. A great

example is the parking: The DCP is obviously angling for a capacity increase, in calling for creation of the gigantic new parking lot. This is fruit of throwing around big-ticket "use" issues in a DCP, when capacity has yet to be addressed. This is not allowable.

While citizens new to these issues might suppose that new parking lots in Yosemite are about creating a workable, new, restrictive transit system which improves the environment and the visitor experience, we do not.

First, obviously, the "Restrictive" alternative represents a huge and negative impact on most visitors experience. Let's be honest about that; we think the "restrictive system" is so completely ill-thought for Tuolumne, that it will necessarily fail. We predict that NPS knows this and knows that something like the "voluntary" system is what it prefers. But this is the first step towards a capacity increase.

Second, the voluntary system, because it is voluntary, and far less convenient than using one's automobile, will not achieve any environmental benefit over No Action. The reason is straightforward: the DCP discusses equal commitment to "out-of-bounds" shoulder parking enforcement under "No Action" and the "Voluntary" alternative. Because the "Voluntary" system adds a huge parking lot, No Action (or the "capacity status quo" alternative, if you like) is plainly environmentally preferable to the voluntary alternative. Where does this leave us?

We believe this "voluntary" system is a veil for increased parking capacity, and an expanded shuttle system. The public will be left with a huge parking increase, an expanded fleet of seasonal busses, and the need to house 41 additional shuttle employees. We therefore repeat,

NPS SHOULD DEAL WITH CAPACITY FIRST, SEPARATELY, IN THE CMP.

2) We think that there are many other areas in which a capacity decision must underpin subsequent decisions; camping, day use hiking, trail use, water quality, and stock use (discussed below). All of the major "use" issues in Tuolumne -- *all of them* -- properly tier from a legally adequate, complete CMP for the Tuolumne WSR, and must rely upon decisions on capacity which protect and enhance the Tuolumne river's protected values.

3) We think the NPS should reduce commercial exploitation of the Tuolumne Meadows area and the Tuolumne River corridor.

The NPS was directed by Congress to study and address the commercial use of stock and its impacts under the California Wilderness Act of 1984. (We would like to acknowledge the exemplary advocacy of the High Sierra Hikers' Association, HSHA, in urging changes in the Yosemite high country for more than 20 years; we have incorporated their analysis). A legal CMP should address these stock impacts thoroughly. Congress directed the NPS to do it. The following is taken directly from the HSHA, and we completely agree with it:

" 1) The "High Sierra Camps" at Tuolumne Meadows, Glen Aulin, and Vogelsang should be removed, the sites restored. The Glen Aulin and Vogelsang sites should be designated as wilderness, as provided by the California Wilderness Act of 1984.

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P. 58, 18

2) The NPS should reduce use of the Tuolumne Meadows/River areas by commercial packstock enterprises, and the NPS should adopt controls to reduce the impacts of these enterprises (i.e., require smaller group sizes for parties with stock, prohibit all grazing, designate campsites for parties with stock, remove all stock-holding facilities (i.e., corrals) from park lands, designate some trails for "foot travel only," require diapers on horses to reduce water/trail pollution, etc.)."

Please Find attachments concerning High Sierra Camps, 1984 Wilderness Act, including relevant congressional direction, and analysis of this issue by HSHA, and Sierra Club Legal Defense. FOYV incorporates these documents by reference.

Respectfully Submitted,

Gregory M. Adair
Director, Friends of Yosemite Valley,
7 September 2006

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HSCs_(HSHA_press_release_19).pdf HSCs_(HSHA_comments_on_YOSE).pdf HSCs_(SCLDF_analysis_1993).pdf



HIGH SIERRA HIKERS ASSOCIATION

P.O. BOX 8920 SOUTH LAKE TAHOE, CA 96158

CERTIFIED RETURN RECEIPT No. P 877 415 241
February 3, 1995

Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389
Attention: Wilderness Office

SUBJECT: WILDERNESS MANAGEMENT PLAN

Dear Superintendent:

This letter transmits the comments of the High Sierra Hikers Association regarding your review of the Wilderness Management Plan for Yosemite National Park. The High Sierra Hikers Association (HSHA) is a registered nonprofit association that represents hundreds of individuals throughout the United States who are concerned about issues affecting hikers in the Yosemite Wilderness.

We are concerned that—although we have submitted extensive comments on issues related to the Yosemite backcountry (e.g., Concessions Management Plan, Little Yosemite Valley EA)—we were not notified of your intention to revise the Wilderness Management Plan (WMP). We heard about your wilderness plan revision only recently from another source. Therefore, we are requesting an extension of the public comment period of at least thirty days, until March 3, 1995. This extension is necessary for us to prepare more detailed comments and to inform our many members of your intent to consider amendments to the WMP. It would be unethical for the NPS to begin revising a plan of such importance without allowing for an adequate scoping period to accept comments from members of a large citizen's organization that has expressed a keen interest in the backcountry of your park.

It is important to note at the outset that the Park Service has not complied with the National Environmental Policy Act (NEPA) during the initial adoption of the Wilderness Management Plan, or during any subsequent amendment. It is imperative that the Park Service follow the public involvement process prescribed by NEPA, including adequate disclosure of environmental consequences, and analysis of alternatives, for a plan to manage the nearly 700,000 acres of designated wilderness within Yosemite National Park. We hereby request that an environmental impact statement (EIS) be prepared.

The existing WMP is replete with vague, general language, and is so full of "loopholes" that it is almost meaningless. The following shortcomings should be acknowledged and corrected during this revision:

1. **Aircraft use.** The WMP states that *"Aircraft will not be used in Yosemite other than flights in response to emergencies dealing with fire suppression, search and rescue, medical assistance, or law enforcement. The Superintendent must approve each nonemergency administrative flight in wilderness. Nonemergency administrative uses of aircraft subject to approval are listed in Appendix C."*

The first sentence states that nonemergency aircraft use will not occur. This lofty language makes bureaucrats and the public feel good. However, the remainder of the language entirely negates the first sentence. For example, although Appendix C says nothing about building new ranger stations, administrators recently proposed to use helicopters to transport materials to Little Yosemite Valley for that purpose. It is clear that administrators at Yosemite NP are giving only lip service to minimizing aircraft use in wilderness. All the exceptions and loopholes should be stricken from the WMP, and it should state that all nonemergency use of aircraft must receive prior written approval from the Regional Director. Administrators at Yosemite have proven that they cannot be relied on to police themselves. A contract helicopter, sitting on the landing pad, already paid for, is too tempting. Authority to approve use of the helicopter for nonemergency purposes must be taken away from local bureaucrats, and vested in a third party who can evaluate the need for aircraft use from afar, without being pressured by staff who favor economical, convenient transportation in lieu of protecting wilderness values.

2. **Campfire impacts.** The existing WMP states that the no-wood-fire zone *"was selected for ease of management."* This is clearly counter to the NPS management policies for wilderness, which state that administrative convenience (i.e., ease of management) is not a standard of wilderness management. Protecting wilderness resources must come first.

The existing WMP states that whitebark pine forests are unable to produce enough dead wood each year to sustain fuel wood collection. Whitebark pine exists down to 9,400 feet in the north half of the park, and 9,800 feet in the south. An entirely arbitrary and bureaucratic decision was made to "split the difference" and settle for 9,600 feet. This does not adequately protect the many areas where whitebark pine forest exists down to 9,400 feet. If one consistent regulation is needed, it should be set at an elevation that will protect the most sensitive areas (i.e., 9,400 feet or lower). Only then will administrators at Yosemite have fulfilled their responsibility under the Wilderness Act.

3. **Group size limits.** The existing WMP takes the irresponsible (and illegal) position that limits on group size will only be adjusted in conjunction with surrounding land units. This ignores the mandate of the Wilderness Act to preserve wilderness values regardless of how other areas might be managed (or mismanaged). The WMP must be revised to state that the NPS will adequately protect the wilderness resources of Yosemite National Park, regardless of how responsibly—or irresponsibly—surrounding

land managers may regulate group sizes. The fact that officials throughout the central and southern Sierra agreed on a consistent number for maximum group sizes is no excuse to ignore the mandate of the Wilderness Act. This is especially true since the 1991 decision to allow 25 stock animals per group throughout the Sierra was adopted without following the NEPA process, and was implemented over the strong objections of hundreds of citizens and scores of conservation groups.

The current group size limits have been shown to significantly and adversely affect wilderness values. In order to adequately protect wilderness values, the limits must therefore be revised downward.

Number of persons per group (on trails). Dr. David Cole, of the Forest Service's Wilderness Management Research Work Unit, has written: "Limits on party size must be quite low (certainly no larger than 10) to be worthwhile" (Cole 1989). We propose that group size (on trails) be limited to 10 persons, as suggested by Dr. Cole.

Number of persons per group (off trail). Large groups traveling "cross-country" cause significantly greater impacts to resources and the experience of visitors (Cole 1989 & 1990, Stankey 1973). Dr. Cole (1989) has written: "...small parties are critical to avoid the creation of new campsites and trails in little-used places...Once a party exceeds a certain number (perhaps four to six), special care must be taken in off-trail travel." As suggested by Dr. Cole, group size should be limited to no more than four to six persons for all off-trail travel.

Travel with stock. Dr. Cole has written that thresholds in group size that result in unacceptable impacts "...would certainly differ between backpackers and parties with stock" (Cole 1989). He adds that lower limits are necessary for stock parties, since they cause greater social and ecological impacts. Yosemite National Park must acknowledge Dr. Cole's quite logical conclusions, and regulate hikers and stock users according to their varying degrees of impact. The current group size regulations in effect for Yosemite's backcountry—which employ the same limits for hikers and stock users—were arbitrarily adopted for "ease of management." This scheme does not comply with either the Wilderness Act or the Park Service's own wilderness management policies.

We propose that groups be limited to no more than nine head of stock per party in the Yosemite Wilderness (Cole 1989 & 1990, Watson et al. 1993), and that all off-trail travel by stock be prohibited. If all members of a particular stock party wish to ride, this would effectively reduce stock groups to fewer than nine persons. This is very appropriate based on existing knowledge of ecological and social impacts caused by stock use.

Recent research has shed light on the effects of large stock groups on the experience of wilderness users. Watson et al. (1993) documented that the average hiker in the central/southern Sierra is unacceptably affected by encountering stock groups with over nine animals. Even stock users themselves are negatively affected by encounters with

large groups—the average *stock user* in the central/southern Sierra is unacceptably affected by encountering groups with over *fifteen* animals (Watson et al. 1993, Table 29 & Table 10). Thus it is clear that *twenty-five* animals in a group will degrade the wilderness character for the majority of visitors. The Park Service must take action to preserve the wilderness character by lowering the group size limit for stock parties.

4. **Cross-country travel.** One shining star in the existing WMP is the prohibition on cross-country travel by groups with stock animals or groups over 8 persons. The plan states:

"It is Service policy to deemphasize cross-country travel by limiting such travel in Yosemite Wilderness to groups of eight people or fewer. This plan recognizes actual and potential environmental deterioration from off-trail use."

and

"Stock must travel on designated trails or authorized stock routes and remain within one quarter mile of trails for watering, rest stops, and camping."

This important language must be retained (and strengthened as per comment #3 above). We strongly oppose any attempt to weaken this language or to open new areas to stock use.

Two loopholes must be addressed. First, the exceptions in Appendix G for cross-country travel by stock animals must be removed. Secondly, nowhere does the plan list or define "designated" or "established" trails. (Appendix G lists "authorized" exceptions but not the "designated" or "established" trails on which large groups are permitted). Some older maps, still in use, show trails that are no longer maintained, and which are not suitable for travel with stock or by large groups. A list or map clearly defining what trails/routes are open to travel with stock and by groups over 8 persons should be added as an appendix to the WMP. This will make clear, to both the public and agency personnel, which routes are open and closed to travel with stock and to groups over eight persons.

We request the opportunity to review the map or list described above before it is adopted. It should be included in the draft environmental impact statement (DEIS).

5. **Monitoring of stock impacts.** The existing WMP contains numerous statements emphasizing the importance of monitoring the impacts of recreational uses (pages 6, 7, 13, 14, 16, 23, 38).

The plan states (p. 23) that: "*Grazing impact will be monitored by the Resources Management Division.*" However, the chapter on Park Operations (the actual plan of implementation) lists no such task for the Resources Management Division. The section pertaining to the Resources Management Division (pages 38-45) discusses in detail a dozen wilderness-related tasks to be performed by the Resources Management Division, none of which include monitoring of grazing impacts.

The WMP desperately needs a program of monitoring for stock-related impacts, including but not limited to: (1) impacts to wildlife, soil, water and vegetation due to grazing and trampling, (2) impacts to water quality and aquatic ecosystems due to stock manure and urine, (3) impacts of stock use (e.g., presence of large groups, presence of grazing animals, construction and maintenance of improvements such as fences and high-standard trails) on wildlife and the wilderness experience of human visitors.

These monitoring programs need to be peer-reviewed and specified in detail in the WMP, including objectives, monitoring schedules, limits of acceptable change, and actions to be taken if those limits are exceeded. Any less would represent only a continuation of the lip service offered by the present plan.

6. **High Sierra Camps.** The High Sierra Camps are the disgrace of the Yosemite Wilderness. They are incompatible with the whole idea of wilderness. Past NPS administrators, however, have considered the camps to be essentially permanent developments that must be perpetuated regardless of the impact. The camps have experienced repeated sewage problems, which the Park Service continues to cover up. The camps require massive inputs of high-impact maintenance, such as mule trains and helicopter flights.

In 1984—over ten years ago—Congress asked the Park Service to prepare a report on the impacts caused by the camps. The Park Service has never conducted the study. Congress also asked the Park Service to monitor environmental impacts at the camps, and to remove the camps if impacts ever increased above 1984 levels. In response, the NPS added flowery language to the WMP, but the monitoring has never been conducted—and when sewage systems failed at Vogelsang and Sunrise camps, instead of removing the camps as directed by Congress, the NPS replaced the sewage systems and even added new buildings to house toilets and showers. These actions constitute radical defiance of the will of Congress and the American people.

In its House Committee report on the 1984 Act that designated the Yosemite Wilderness, Congress recognized the incompatibility of the High Sierra Camps, and, in a rare move, deferred its authority to allow the Secretary of Interior to designate the enclaves as wilderness once the nonconforming developments are removed. This vision will never be realized as long as the Park Service continues to ignore Congressional direction and to promote continuance of the High Sierra Camps at all cost.

Clear direction is needed to remedy this situation. The Wilderness Management Plan should require the following: (a) an independent study to document baseline conditions at the High Sierra Camps, funded by the Park Service and conducted under contract by a reputable California university, (b) a provision for low-intensity annual monitoring by the Resources Management Division (of parameters to be recommended by the initial study), plus intensive, independent monitoring of conditions at each camp no less frequent than every five years (under contract as in "a" above), and (c) a provision (without loopholes) that if any adverse environmental impacts resulting from operation of the High Sierra Camps should ever increase beyond those documented in the

baseline study, that the offending camp will be promptly removed and the area recommended to the Secretary of Interior and to Congress for wilderness designation.

7. **Commercial Outfitters.** The Yosemite Wilderness is so popular that quotas on its use have been implemented to prevent unacceptable impacts. We support the implementation of restrictions designed to protect wilderness values. However, commercial outfitters should not be allocated easy access when the general public is turned away due to use quotas.

One horse (or mule) can produce *at least* as much impact as several people (see references below in section on recreational stock use). Your management plan should state clearly that: (1) Commercial stock use of the Yosemite Wilderness is a privilege—not a right, and (2) Commercial stock use shall not be given priority over private foot travel. *Wherever rationing (i.e., a quota system) is necessary, commercial stock use shall be reduced to maximize the number of people allowed to enjoy the area.*

In addition, all commercial outfitters (or their clients) should have to wait in line with the rest of the public to obtain wilderness reservations and permits. Commercial pack stations should never be allowed to issue their own permits. (This is a ridiculous notion, and one that illustrates the special treatment that commercial packers receive from land managers in some areas.)

Finally, the operation of livestock pack stations is contributing to the demise of songbird populations in the Sierra Nevada by creating artificial habitat for the parasitic brown-headed cowbird. Cowbirds are obligate brood parasites that can significantly impact native passerine species. One study in the northern Sierra found that up to 78 percent of warbler nests are parasitized by cowbirds, resulting in significant decreases in the reproductive success of those species (Airola 1986). Elsewhere in the Sierra, individual female cowbirds have been reported to lay an average of 30 eggs per season (Fleischer et al. 1987). These high rates of parasitism and fecundity by cowbirds indicate that significant local impacts occur wherever cowbird populations are present. Habitat modifications and the presence of livestock throughout the Sierra may contribute significantly to regional declines in songbird populations (Graber 1991). A detailed literature review on cowbird impacts is enclosed and incorporated by reference. The impacts of continued operation of pack stations that service the Yosemite Wilderness must be evaluated. An environmental impact statement (EIS) should be prepared that clearly discloses the environmental consequences of, and alternatives to, the continued operation of pack stations servicing the Yosemite Wilderness.

8. **Recreational Stock Use.** Parties traveling with stock have much greater impact on wilderness resources than groups traveling on foot. Our members feel very strongly that the disproportionate amount of impact created by stock users must be mitigated.

Impacts to meadows, stream zones, and lakeshores

Trampling and grazing by livestock are known to increase soil compaction and to contribute to streambank erosion, sedimentation, widening and shallowing of channels,

elevated stream temperatures, and physical destruction of vegetation (Behnke and Ralieggh 1978, Bohn and Buckhouse 1985, Kauffman and Krueger 1984, Kauffman et al. 1983, Siekert et al. 1985). Streambanks and lakeshores are particularly susceptible to trampling because of their high moisture content (Marlow and Pogacnik 1985). Unstable streambanks lead to accelerated erosion and elevated instream sediment loads (Duff 1979, Winegar 1977).

Numerous studies have documented impacts to meadows caused by recreational stock (Cole 1977, Merkle 1963, Nagy and Scotter 1974, Neuman 1990 & 1991a-b, Strand 1972, Strand 1979a-c, Sumner and Leonard 1947, Weaver and Dale 1978). Your wilderness management plan should include the following elements to mitigate these impacts:

- * Opening dates for all areas where grazing is permitted, to prevent trampling damage when soils are wet in the spring. (Regulations and the minimum-impact message for stock users must include requirements for carrying certified seed-free feed for use when traveling before the opening dates for grazing.) Opening dates should be set conservatively (to err on the side of the resource—not the user), consistent with the biocentric approach described in Hendee and others (1990). The current Wilderness Management Plan fails to specify opening dates for grazing.
- * Permanent grazing closures (and requirements to carry feed) in areas where soils remain wet throughout most of the summer. This is necessary to avoid trampling damage in perpetually wet, high-elevation areas. Grazing by domestic livestock in such areas is inappropriate, due to the resulting deep hoofprints, destruction of vegetation, and soil erosion caused by pulverization of wet, low-strength soils. Many national parks throughout the United States have recognized this and have banned grazing by domestic stock in subalpine areas. The current Wilderness Management Plan fails to prohibit grazing in fragile, perpetually wet, high-elevation areas.
- * Group size limits for stock parties that recognize the greater impact of stock on wilderness resources (see above for detailed discussion of group size limits).

Trail damage by stock animals

When compared to hikers, stock parties cause significantly greater impacts to trails (Dale and Weaver 1974, Frissell 1973, Kuss et al. 1986, Laing 1961, McQuaid-Cook 1978, Trotter and Scotter 1975, Weaver and Dale 1978, Weaver et al. 1979, Whitson 1974, Whittaker 1978, Wilson and Seney 1994).

Whitson (1974) provides a good discussion of how horse impact differs from hiker impact. Dale and Weaver (1974) observed that trails used by horses were deeper than trails used by hikers only. Trotter and Scotter (1975) documented deterioration of trails used by large horse parties. Weaver and Dale (1978) found that horses caused significantly greater trail damage than hikers. Whittaker (1978) concluded that horses significantly increased the potential for severe erosion by churning soil into dust or mud. Weaver et al. (1979) found that horses caused more trail wear than both hikers

Superintendent, Yosemite National Park

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and motorcycles. After reviewing the available literature, Kuss et al. (1986) concluded that: *"Pack stock and horse travel is considerably more damaging to trails than hiking."* Recent research (Wilson and Seney 1994) has confirmed these earlier studies, concluding that *"horses produced significantly larger quantities of sediment compared to hikers, off-road bicycles, and motorcycles."*

To mitigate these impacts of stock use, your wilderness management plan should include the following elements:

- * Groups using stock should be limited to ten or fewer animals per party (as suggested by Cole 1989 & 1990).
- * To allow reasonable access for stock users, and to reduce the impacts of stock use on trails, a core network of main trails should be designated and maintained to withstand stock travel. Proper maintenance of these trails (and reconstruction where necessary) would reduce (but not offset) the impacts of stock travel.
- * A network of "foot travel only" trails must be designated so that hikers can enjoy a stock-free experience. These trails should be maintained for *foot travel only*. Funds saved by designating a network of "foot travel only" trails could be used for intensive maintenance of the core stock trails (see Cole [1990], p. 461).

Water quality impacts of stock animals

Stock urine and manure contribute to eutrophication of streams and lakes (Stanley et al. 1979). Such impacts are a significant concern in the aquatic environments of the Yosemite Wilderness. Livestock manure can also pollute water with organisms such as *Giardia* and *Campylobacter*, which may be pathogenic to humans and other animals.

The pro-livestock lobby groups claim that the strains of *Giardia* and *Campylobacter* spread by domestic livestock are not infective to humans. This is wishful thinking. Their argument that humans cannot contract *Giardia* from stock animals hinges on a single inconclusive study conducted on domestic cats. The cross-transmission of enteric pathogens from stock animals is certainly controversial. However, there is an increasing body of evidence that *Giardia* and *Campylobacter* (as well as other pathogens) can be spread from stock animals to humans (Bemrick 1968, Blaser et al. 1984, Buret et al. 1990, Capon et al. 1989, Davies and Hibler 1979, Faubert 1988, Isaac-Renton 1993, Kasprzak and Pawlowski 1989, Kirkpatrick and Skand 1985, Kirkpatrick 1989, LeChevallier et al. 1991, Manahan 1970, Manser and Dalziel 1985, Meyer 1988, Rosquist 1984, Saeed et al. 1993, Stranden et al. 1990, Suk 1983, Suk et al. 1986, Taylor et al. 1983, Upcroft and Upcroft 1994, Weniger et al. 1983, Xiao et al. 1993).

Your environmental document must evaluate and disclose the effects of animal wastes on the wilderness environment, and your wilderness management plan should include the following elements to minimize the amount of animal waste that reaches water courses:

- * Campsites for stock users should be designated away from water, on level and dry sites. Stock users should be required to camp at these designated sites, and to keep their animals tied at all times when not in use. This will require stock users to carry feed for their animals, as is required in many other national parks. Managers should carefully select and designate campsites and hitching sites for such use (see Cole [1990], pp. 457-462).

Aesthetic effects—adverse impacts on the “wilderness experience”

We are also concerned about the many aesthetic impacts that result from stock use, such as the presence of annoying bells, dust, manure, urine, and flies, and the proliferation of unsightly hoofprints, drift fences, and overgrazed areas (see Absher 1979, Cole 1990, Stankey 1973, Watson et al. 1993). Most of the elements suggested above would have the added benefit of offsetting these “social” impacts. For instance, designating campsites for stock users at popular destinations would prevent sites used by hikers from being littered with stock manure. Tying stock and supplying feed will eliminate the need for bells and drift fences, and will prevent overgrazing and trampling of sensitive areas by stock. Designation of a network of “foot travel only” trails will provide hikers with a stock-free experience (i.e., no manure or dusty trails churned by stock, etc.). Adoption of group size limits based on science (see Cole 1989 & 1990, Watson et al. 1993) will reduce the impacts of large stock groups on the experience of hikers.

9. **Fish Stocking.** The introduction and/or addition of exotic fish causes many unnatural alterations in aquatic and terrestrial ecosystems. The HSHA opposes the stocking of exotic fish in wilderness areas. Your wilderness management plan should state that the Park Service shall do everything in its power to convince the state fisheries agency to discontinue all fish stocking within the Yosemite Wilderness.

CONCLUSION

Our most critical general comment is that the protection of wilderness resources must be given the utmost importance. Convenience, economics, and commercial uses are not standards of wilderness management, and must be considered subordinate to the protection of wilderness values. This fundamental premise is echoed throughout the Wilderness Act of 1964 as well as the NPS's 1988 Management Policies for wilderness. The High Sierra Hikers Association supports the adoption of stringent regulations, restrictions, and use limits necessary to protect wilderness values, including those that would inconvenience hikers or preclude our use of certain areas.

Please prepare an environmental impact statement (EIS) for the purpose of amending Yosemite's Wilderness Management Plan to incorporate the above-stated concerns.

Please extend the public scoping period for at least thirty days (i.e., until March 3, 1995).

Please send copies of all environmental and decision documentation, and keep us informed of all opportunities for comment.

Superintendent, Yosemite National Park

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Please contact us if you have any questions regarding the issues raised in this letter. We would be most happy to clarify any of our concerns.

Yours sincerely,

Original Signed By

Peter Browning
Coordinator

enclosure: "The Brown-headed Cowbird in the Sierra Nevada: Impacts on Native Songbirds and Possible Mitigation Measures"

FW/jc—yosemite.wmp

REFERENCES

- Absher, J., and E. Absher. 1979. Sierra club wilderness outing participants and their effect on Sierra Nevada wilderness users. pp. 31-60, In: J.T. Stanley et al. (eds.) *A Report On the Wilderness Impact Study*. Sierra Club, Palo Alto, CA.
- Airola, D.A. 1986. Brown-headed cowbird parasitism and habitat disturbance in the Sierra Nevada. *J Wildlife Manage* 50(4):571-575.
- Ames, C.R. 1977. Wildlife conflicts in riparian management: Grazing. pp. 49-52. In: Johnson, R.R. and D.A. Jones. Importance, Preservation and Management of Riparian Habitats. USDA Forest Service, Gen. Tech. Rpt. RM-43. Rocky Mtn. Forest & Range Experiment Station, Ft. Collins, CO.
- Armour, C. 1979. Livestock management approaches and the fisheries resource. p. 39. In: Cope, O.B. (ed). *Proc. of the Forum on Grazing and Riparian/Stream Ecosystems*. 94 pp. Trout Unlimited, Inc. Denver, CO.
- Behnke, R.J. and R.F. Ralieggh. 1978. Grazing and the riparian zone: Impact and management perspectives. pp. 184-189. In: Johnson, R.D. and J.F. McCormick. *Strategies for Protection and Management of Floodplain Wetlands and other Riparian Ecosystems*. 410 pp. USDA Forest Service Gen. Tech. Rpt. WO-12. Wash., D.C.
- Bemrick, W.J. 1968. *Giardia* in North American horses. *Vet Med/SAC* 63:163-165.
- Blaser, M.J., D.N. Taylor and R.A. Feldman. 1984. Epidemiology of *Campylobacter* infections. In: Butzler, J.P. (ed.) *Campylobacter Infection in Man and Animals*. pp. 143-161. CRC Press, Inc. Boca Raton, FL.
- Bohn, C.C. and J.C. Buckhouse. 1985. Some responses of riparian soils to grazing management in northeastern Oregon. *J Range Manage* 38:378-381.

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FOR IMMEDIATE RELEASE

Contact: Peter Browning
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Park Service Violates the Law in Yosemite

Illegal developments are polluting Yosemite National Park, and the National Park Service itself is responsible.

A string of "High Sierra Camps" exists deep in the Yosemite Wilderness to provide luxury accommodations for a tiny minority of privileged park visitors. All of the by-products of human occupancy are produced here: sewage (body wastes), "gray water" from showers, grease and detergents from kitchens. But there are no water or sewage treatment plants here. Wastewater is funneled into pipes and ends up in the meadows, soils, and waters of Yosemite National Park. The waters from three of these camps flow into the Merced River, which runs through Yosemite Valley. The waters from two others, and from the non-wilderness High Sierra Camp at Tuolumne Meadows, flow into the Tuolumne River, which flows to the Hetch Hetchy Reservoir—and provides drinking water for San Francisco and other communities.

Congress specifically recognized this threat to Yosemite when it passed the California Wilderness Act of 1984. The Act, signed by then-President Reagan, bestowed formal wilderness designation to the Yosemite backcountry, prohibiting forever any logging or road building. The Act allowed the High Sierra Camps to remain, but stated:

"If and when it occurs that the continued operation of these facilities . . . results in an increased adverse impact on the adjacent wilderness environment (including increased adverse impact on the natural environment within the enclaves themselves), the operation of these facilities shall be promptly terminated, the facilities removed, the sites naturalized, and in the procedure set forth by section 9 of the bill, the areas promptly designated as wilderness."

The National Park Service at Yosemite has repeatedly violated this law by refusing to remove the High Sierra Camps where pollution problems have worsened in recent years.

The 1984 Act also states:

"Because of the importance of continuing monitoring and assessment of this situation, immediately upon the enactment of this bill into law, the Secretary of the Interior should document current baseline operational and environmental impact conditions of all of these facilities, and he should also, within one year of the date of enactment, report in writing to the relevant committee of the House and Senate, his findings and recommendations as to this matter. Annual assessments of this situation should thereafter be made by the Secretary to assure continued monitoring of conditions."

Park Service Violates the Law in Yosemite - 2

The Secretaries of Interior under Presidents Reagan and Bush never complied with this directive, and the Park Service has never prepared the baseline report or annual monitoring reports requested by Congress.

After passage of the 1984 Act, it became increasingly evident that the meadows and streams around the Vogelsang High Sierra Camp were being threatened by wastewater from the camp. Instead of closing the camp as required by law, the Park Service in 1985 constructed a new "leach mound" system in an effort to contain the wastes. (The California Wilderness Coalition, a consortium of over seventy citizen groups, submitted a detailed letter questioning the new construction. The Park Service claimed that it never received that letter.)

The 1985 Vogelsang project involved a great amount of explosives, soil disturbance, and helicopter use in the remote, pristine area south of Tuolumne Meadows. But the fix was short-lived. By 1990 it was obvious to the Yosemite administration and to the Curry Company (the operator of the camp) that the mound system was failing:

"After several seasons of continuing environmental concerns, NPS maintenance representatives have determined that the mound system for sewage disposal at the Vogelsang High Sierra Camp is inadequate to properly handle solid wastes generated by Camp guests and employees." (Yosemite National Park Project Proposal Form, dated 1/16/91.)

Pollution from the Vogelsang Camp was again seriously threatening the Yosemite Wilderness. At this point (as in 1985) the only correct, legal action would have been to close the camp, naturalize the site, and promptly designate it as wilderness.

But as lawbreakers of all sorts, from speeders to murderers, have discovered, once you break the law and get away with it, it's easier to do it a second time. In the case of a government agency there is even a ritual dumbshow that inventive bureaucrats can use to violate both the letter and the intent of the law.

First, you do an EA (Environmental Assessment), which lends itself to producing whatever conclusion you wish to reach. You simply survey the scene (or sit in your office and 'survey' it from there), and assert that Yes, thus and so needs to be done, and No, it won't hurt anything. To demonstrate that you are wisely considering all possible solutions, you need to present alternatives. In the Vogelsang case, just two alternatives were presented: 1) Do nothing; and 2) Construct composting toilets (the Park Service's "preferred alternative"). Never mind that the CWA does not permit either of those alternatives. The law provides for one thing only: close the camp permanently. There is no provision in the law that permits the NPS to do an EA, and thus circumvent the law that its mandate requires it to implement and enforce.

The next fancy step in this weird dance is to perform a FONSI (Finding Of No Significant Impact), which enables you to deny—before the fact—that even though your own studies and documents describe an obvious, radical impact, you state that there actually isn't one. Furthermore, since your FONSI is endowed with internal truths, it is not controversial, and thus no one cares what you do, and since no one cares, no one need be informed and no one need be asked to comment on your nefarious doings. "Park and Regional Staff reviewed the Programmatic Environmental Assessment. The preferred alternative was not considered to be controversial and this program has been proceeding for a number of years. Therefore public comment was not solicited." (FINDING OF NO SIGNIFICANT IMPACT, Backcountry Composting Toilets, Yosemite National Park, July 1991.)

So in the summer of 1991, without asking for public comment, the Park Service once again ignored the law and constructed new toilet facilities at Vogelsang High Sierra Camp.

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Park Service Violates the Law in Yosemite - 3

The 1980 General Management Plan (GMP) for Yosemite National Park, preceeding the California Wilderness Act by four years, had its own strong, precise language concerning the status and potential future of the High Sierra Camps. Certain lands, including the HSCs, were reclassified as "Potential Wilderness Additions." The exact language in the Final GMP stated:

"Potential wilderness classification will prevent any further development of facilities or services; should existing developments be removed, there will be no reconstruction of facilities. Wilderness classification will require the eventual elimination of all improvements that do not conform with wilderness activities. Use of wilderness areas will be restricted to activities that are compatible with the definition of wilderness as cited in the Wilderness Recommendation for Yosemite National Park (National Park Service, 1972).

"All additional lands proposed for potential and actual wilderness classification will be protected from further development. The Ostrander ski hut and the High Sierra camps will be classified as potential additions to wilderness."

If the Yosemite National Park administration had the intention of protecting potential wilderness additions and complying with the relevant laws, it would need to do five things: 1) be consistent with the California Wilderness Act of 1984; 2) be consistent with the 1980 General Management Plan for Yosemite; 3) be consistent with NPS Management Policies for wilderness; 4) satisfy the requirements of the National Environmental Policy Act (NEPA); and 5) allow for public participation. The current actions of the Yosemite administration concerning the HSCs meet none of these conditions. Indeed, the Park's blatant disregard for the law and its disinclination to provide protection for potential wilderness additions are indicative of a peculiar mindset that presently holds sway at Yosemite: If we define our own illegal activities as harmless, then it is okay to proceed.

The leach mound and toilet facilities constructed at Vogelsang High Sierra Camp are illegal, and by law should be removed. Furthermore, since the camp cannot operate properly without those developments, the Park Service should acknowledge its mistake and comply with the law by removing the camp, naturalizing the site, and recommending it for wilderness designation. If the Park Service does not, the present facilities will only fail again, and the alpine meadows and waters surrounding Vogelsang will be further polluted.

In 1991 the Park Service admitted that:

"At Sunrise camp, there are inadequacies in the sewage system and in potable water; work will be required in the near future." (Draft Concession Services Plan Environmental Impact Statement, December 1991.)

Instead of complying with the law by documenting the problems and removing the Sunrise camp, the Park Service this summer intends to construct a 604-square-foot building at the Sunrise camp to house toilets and showers. This is being done in utter disregard of the law.

The High Sierra Camps do **not** provide a necessary service to the "general" public. The vast majority of wilderness visitors—and Yosemite's natural environment—suffer the impacts of the camps (water pollution, helicopter noise, the manure, flies, dust, and trail damage caused by the heavy use of horses and mules to supply the camps with food and drink) solely to provide plush living conditions (\$73 per night) in a wilderness setting for the moneyed few.

All persons are urged to contact the Superintendent of Yosemite National Park and request that the law be followed by removing all High Sierra Camps that are shown to be polluting what may be our most magnificent national park.



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Please respond to
craigslmail

To: YOSE_Planning@nps.gov
CC:
Subject: Tuolumne Planning

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TWSR-302-815
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P. 1072
YOSEMITE NATIONAL PARK

Subject: Tuolumne River Plan and Tuolumne Meadows Plan

Dear Yosemite National Park Representative,

Thank you for the opportunity to comment on scoping for the Tuolumne River Plan and the Tuolumne Meadows Plan. My family often enjoys car camping, day-hiking, and backpacking in the Tuolumne Meadows area and vicinity. We have noticed increasing numbers of visitors to the area, particularly on weekends in July and August. Please consider the following in the scoping:

*Continue to provide or extend shuttle bus service to reduce vehicle trips and pollution.

*Continue to enhance the safety and ease of traveling by bicycle, foot, and other non-motorized means.

*Consider traffic and pedestrian safety improvements at some of the popular hiking trailheads. For some trailheads, on busy weekends there are dozens of vehicles parked along both shoulders of the road (Highway 120). The shoulder parking contributes to possible traffic and pedestrian safety problems. Additional off-highway parking areas should be considered if they can be constructed in an environmentally sensitive way.

*Consider water quality improvements at some of the popular hiking trailheads. At several trailheads, vehicles park along the shoulders of the road (Highway 120) in very close proximity to wetlands and tributaries to the Tuolumne River. "Water Gardens" or storm drains with filter elements could be constructed to accept and filter stormwater runoff from parking areas that drain directly to streams and rivers.

*Continue to emphasize low-technology, low-impact use of the park lands and river.

*Maintain existing levels of car camping without modern hookups. Do not provide electrical/water/sewer for RV camping, except possibly for disabled camping sites.

*Consider upgrading or repairing some of the ancient restrooms in Tuolumne Meadows Campground so as to provide night-time lighting inside and out, and handicapped accessibility.

*Consider providing a "Walk-in" campground somewhere, for those who seek a quieter, more peaceful camping experience.

*Travel on rivers and streams should be generally restricted to non-motorized craft such as canoes, kayaks, and rubber rafts. Consider allowing boats with electric motors, for emergencies, rescues, and possibly for disabled persons to experience river travel.

*Continue to allow backpacking on trails, with no significant change in the daily trail quotas and permit system.

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*Presently backpacking and camping within 4 miles of developed areas is prohibited. Consider relaxing the 4 mile requirement for seniors or those persons unable to walk that far in one day. We backpack with two family members in their 80s and they have difficulty hiking more than 3 miles a day. They do not like to travel by horse. The 4 mile restriction means we cannot go to the Young Lakes and Mount Conness area.

Thank you very much for your consideration.

Sarah Craig

[REDACTED]

Santa Barbara, CA 93109

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P. 1083

YOSEMITE NATIONAL PARK

To Yosemite Superintendent Re: Tuolumne Planning

The primary goal of the Tuolumne River Plan should be to preserve and protect the area from impacts caused by human activity there. In general, Tuolumne Meadows is at user capacity most of the summer and above capacity on holiday weekends and the first three weeks of August. It will be important to restore the most impacted areas and to prevent future abuse. It is still relatively wild and no major "improvements" "upgrading" or new uses should be considered. It should remain closed when there is snow, no snow-mobiles or motorized vehicles should ever be allowed then, and no new river uses - eg kayaks, etc. The gateway communities will obviously need to be involved, but they should never be allowed to interfere with the park mission or decisions such as when to plow the Tioga Road. Their goal has always seemed to be economic profit from their proximity to the park. Good relations must be maintained, but their goals are not always complementary with the goals of the park. Trails: Horses and pack animals cause enormous damage and their droppings are unpleasant and seeds can introduce non-native plants. Stable animals should only be used to supply High camps - no visitor rides should be provided. No visitors should bring horses. Should investigate use of llamas to supply High Camps. Commercial outfitters from outside should not be allowed. The current number of stock allowed per party is totally unreasonable. - although dogs are not allowed on trails or in meadows, etc, they are there fairly frequently. Most owners I encounter know the rules. An effort should be made to discourage people from bringing dogs. There is nothing for them to do in the park and they are a nuisance to others. - Interpretive signing should be kept to a minimum. Visitors can be educated in other ways. The signs detract from the scenery. - Some trail revegetation needs to be done. Why is there a trail across the meadow east of Pothole Dome? It is a wet area early in the season and soon it will have many other paths like other trails. - the trails from the Visitor Center to Parsons Lodge and the Soda Springs Road need work. There is a trail from the D loop following the stream out to the main trail from the Visitor Center. It should be removed. - Visitors need to know what to do with their waste and toilet paper. Facilities: Lodge is historic and should stay. Tent cabins are appropriate. It seems to be built on bedrock and probably is not too damaging to the environment even though it is close to the river. Perhaps the plumbing is a problem? - Stables: already mentioned. Amenities to guests could be reduced to reduce amount of supplies needed eg number of showers allowed per person. - GAS station : I would not be opposed to removing it. - Facilities should not be centralized. It should maintain its temporary appearance. Consolidating would resemble a city and give a more permanent character. Lodge, store, and some ranger housing should continue to be tents that are disassembled each year. - Ranger housing should not be moved out of park. That would add to already heavy traffic flow, increase pollution. Interpretive rangers especially should live in the environment they work in. They develop a deep connection with the place and this is then conveyed to visitors. They also have schedules that do not easily lend themselves to living outside the park. This is a very important factor. If they should be required to move, so should everyone - all visitors, staff, everyone. Road: Speed is the biggest issue. People entering the park are often thinking of other things. They must be made aware at the entrance that they are entering a park, the speed limits are reduced, and they must slow down to enjoy the park and to protect the animals and themselves and others. There could be a large sign at the entrance indicating how many animals have been killed - in the current year or something like that. They could be required to sign a

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brief statement as they have been requiring in the campground for about the bears. Something has to get their attention. (I've heard that no bears have been killed by automobiles in the Tuolumne area in the past three years. However, there was a porcupine killed and, although I've seen many living bears, I've never seen a living porcupine. I think they are much more rare.) Having visitors sign a statement would slow down entrance even more at busy times. I don't have a solution for that. There would have to be some way to assure that a visitor is not asked more than once a visit as well. - The parking lot south of the road at Tioga Pass has very dangerous exits. Some vegetation should be removed. There is also a very abrupt drop in speed from 45 to 25 just west of one of those exits. The sign should be farther west. - Speed bumps at some of the worst spots may be one idea. Speed monitoring devices that flash how fast a vehicle is moving do help, at least temporarily. They should be moved periodically. Parking: Parking along the roads is an enormous problem. Cathedral Lakes Trailhead is one of the worst. A parking lot is probably needed and then allow no parking along the road there. It seems necessary to lower the backpacking permits limit by a significant number. This is also important at Dog Lake Trailhead. Much of the parking along the road has to do with climbers. Should they be required to have permits too? All the parking areas are overloaded. It is dangerous, people are parking on vegetation, and it is unpleasant. Running shuttles more regularly and having more regular stops might encourage people to leave their cars in the campground and in the Lodge parking. That would help some, but it would still be necessary to lower the number of permits. Tenaya Lake parking along the road also is dangerous. Too many people do not pull completely off the road. Campground: Do not pave the road. The campground should maintain its rustic feel - Campers should not be allowed to pick up wood. Down and dead wood is important to the health of the forest. - Could campfires be discouraged? They are polluting. Maybe different loops could be allowed on different days. - Rules about the number of campers and vehicles per site are not being enforced. The sites are often over-used, the footprint of the sites are expanding, vehicles are parking on vegetation, the noise level generally goes up with more people. - Do not heat or add lights to the bathrooms. - Do provide liquid soap and paper towels. Basic hygiene. - Impacted areas outside the sites should be restored. - Repair some driveways. Campers have trouble driving over and around some rocks, they spin their wheels adding to erosion. Appropriate camping equipment should be assigned to appropriate sites. (No huge trailers in G-21) Those who work in the kiosk need to know their sites. - Noise and excessive lights by campers are problems. Dogs, music, very young children. Campers bring ridiculously bright lanterns at times. - Why are dogs allowed at all? They are not allowed at the Lodge. Campers should be advised when they make their reservations that no dogs are allowed. Dogs are inappropriate at a national park and a nuisance at best (I should use "pets I suppose") - Adding a shuttle stop at the west end of the campground would be convenient for those camping there. - I'd like to see RVs eliminated. Since that is highly unlikely, their numbers and size should be reduced. The campground should not be changed to accommodate them. - I've heard it suggested that the store be turned around so the parking is off the road and the entrance faces the campground. That would most likely eliminate some of the camping sites. A smaller campground would be OK. It might keep visitors from trampling that part of the meadow so much. The number of other types of visitors should then be lowered too. Soundscape: Aircraft particularly military jets are a problem. They should not be allowed

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to fly over. - I mentioned noise in the campground. Campers should always be quiet. Setting quiet hours seems to condone noise at other times. - Harleys and I suppose other motorcycles can be extremely noisy and detract from a visitor's enjoyment. Some RVs seem to be extra noisy. The maintenance crew partying near the Visitor Center creates an inappropriate kind of noise. Why should they be allowed to use amplified instruments and mikes? It can be heard throughout the meadow. Scientific study should continue and be expanded. I notice especially a lack of information about butterflies. Fish should be removed wherever feasible. Funding for naturalists should be more stable and dependable. In conclusion, the number of visitors seems to cause the most problems. Those who visit should view it as an honor to be allowed to enter the home of that which already lives here - it is the home of the natural world- animals, plants, etc. There needs to be a respect for that world and for other visitors to it. We need to allow it to exist and flourish, to lessen our impact on it, and to repair as much damage as possible. Reducing the number of visitors and enforcing regulations that already exist would go a long way to correcting the abuses. L. Lawrence, [REDACTED] Eureka, CA

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TWR-5-304
Yosemite National Park

Pg 1 of 2

All interested individuals, organizations, and agencies are invited to provide written ideas, concerns, or suggestions during the public scoping period, which closes **September 7, 2006**. Written comments may be mailed to: **Superintendent, Yosemite National Park, P.O. Box 577, Yosemite, CA 95389** (Attn: Tuolumne Planning). Written comments may also be faxed to: **209/379-1294**. Electronic comments may be emailed to: **Yose_Planning@nps.gov** (in the subject line type: Tuolumne Planning). Comments can also be submitted online by going to **parkplanning.nps.gov/yose**. Keep track of project status by regularly visiting the park's web site at **www.nps.gov/yose/planning/trp**.

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Name: Beth Ogilvie, Susan Staghalis

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Comment: _____

Address: _____

Castro Valley, CA 94546

Comments

1. What do you love
2. What do you do
3. What would you like to see protected
4. What services or facilities would you like to see offered or removed

1. Availability of hiking. All that granite. Flowers. Mtns. Peaks. Lakes. The river - and the view of Lembert Dome across the river. The shuttle bus - and the helpful drivers (esp Herb). Very old trees. U shaped valleys. Old unmaintained trails. Cross-country route finding.

(continue comments on back of page)

2. Hike. Mostly day hiking. We're not climbers or mountaineers, but we like to get to high places - peaks, passes, alpine lakes. We've done Conness (both sides), White, False White, Dana, Gibbs, Lewis, Mammoth, Rafferty, Johnson, Vogelrang, Hoffman, Tuolumne, Tenaya, Clouds Rest, Half Dome, N. Dome, Basket Dome, Watkins, etc. We also have rest days where we sit by the river.
3. The real wilderness - away from the road.
 The air quality. It'd be fine w/ us to ban campfires in the campground - and in the backcountry.
 The quiet. No music - and no generators.
 "A" loop. The Grill + the Store.
 The river. Iro, it seems good the way it is.
 Bears - take a really tough stand - ^{give fines or evict -} ~~don't just leave notes~~
4. Recycling can be vastly improved - a great big bin for plastics, another for cardboard.
- Old bathrooms in the campgrnd need work!
 (The toilet by A41 is wonderful since ~~it~~ renovation)
 - Internet access would be nice, pref. WI-FI - could just be in the vicinity of the Grill.
 - Fix the grill at the Grill. Bring back buckwheat pancakes!
 - Cell phone service (digital, affordable)
 - Laundry would be nice (if you had laundry + internet it would save our weekly trip to Lee Vining) but maybe it's too much for the sewage facility.
 - Better parking at trailheads, esp Cathedral
- Publicize the free shuttle bus! Put info on the hiker bus along w/ shuttle + YARTS bus info at the store's bus stop.
 People can't use what they don't know about.
 (The shuttle + YARTS info there is good - just add hiker bus info.)

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TRP-5-305

YOSEMITE NATIONAL PARK

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Name: JILLIAN A METZ

Date of Comment: 8-20-06

Address: [REDACTED] SANTA ROSA CA 95405

Comments

Tuolumne is a majestic, inspiring & very special place. It has a short growing season. Winter gives it time to rest & recover from human impact. Keep the temporary lodging, store, post office etc. Keep the Visitor Center as it is. Keep any other stores & conveniences OUT of Tuolumne. Keep the Ranger Park employees ^{living} in the park. They are an asset to seeing them with their families brings a sense of

Community.

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pg 2 of 2

The Campgrounds need more bathrooms but
NO showers or hot water.

Inlump needs to be preserved as a place
bordering the wilderness!

Put all campers, trailers & motor homes
together in only a few places.

Make Inlump mainly a Tent-Campground.

NO DOGS in park. People do not
keep them off the trails & mt of the
rivers & lakes.

Horses & mules go round meadows & not
through them.

Increase ^{campfire} ranger programs for children.

Continue removing Lodgepoles.

Try to eliminate social trails in meadows.

Keep the river wild & scenic &
remove the O'Shaughnessy Dam.

Continue the Parsons Lodge Summer Series
excellent programs.

Keep the High Sierra Camps.
Keep Inlump much the same as it is.

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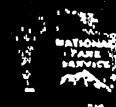
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YOSEMITE NATIONAL PARK

- Thank you for keeping things so beautiful.

Yosemite National Park

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TDR-5-307

Yosemite National Park

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Name: Jesse Burkhardt

Date of Comment: 9/5/06

Address: Tuolumne Meadows

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Comments

In the United States there are not many places left that are protected or have not been developed in some way. Because we are a National Park with some of the greatest laws protecting us I think it is our duty to keep Yosemite untrammeled and pristine. I believe we have already failed immensely in doing so by building roads and constructing houses, buildings, tram tours but we still have the opportunity to do our best in restoring nature to its natural way of being and because we are designed to do that I think we should. There are no places protected so much in that no human can enter or no roads could eventually

be built so we should do our best with what we have here to make a fraction of the world a true wilderness area. I vote to most importantly set some kind of standard saying that development or constructing new buildings, expanding civilization, commercialism, stores, cars, people are not what wilderness is meant for. To set this standard I think at the very least we should not develop any more new structures in Tulum, no new roads nothing man made.

2nd, With the inevitable development another standard could be set to use eco friendly power like solar power and biodiesel or alternative fuels.

Personally I would like to see no cars allowed in Tulum and the whole park only shuttles, no parking lots no gas station no store and last but not least a conflicting interest with shuttles, no road to Tulum. There is one north & south of the park why do we need one in the park.

As a Tulum resident I urge you to look at Margaret's housing survey and realize that people like tent cabins they aren't for everyone but it's part of living in this place and we should feel lucky to live ~~the~~ here and be able to live so simply.

Please for future generations preserve Tulum and the river and do not "develop."

No dams.

Yosemite National Park

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TMR-5-308
YOSEMITE NATIONAL PARK

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Name: John White

Comment: _____

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9/3/06

Address: _____

Oakland, CA 94618

Comments

I have been coming to Tuolumne Meadows for over thirty years for various outdoor pursuits. It has always struck me as a nearly perfectly managed ~~site~~ station. Really I don't think anything needs to change. Even the staff housing and general infrastructure for visitor facilities is appropriately managed. I'm aware of how fragile a landscape this high alpine meadow is, but NPS has instituted a system at T.M. that seems to work. Sure there's some tweaking, but it functions well and lightly on this land and it seems sustainable to me.

NAME Winto

STREET [REDACTED]

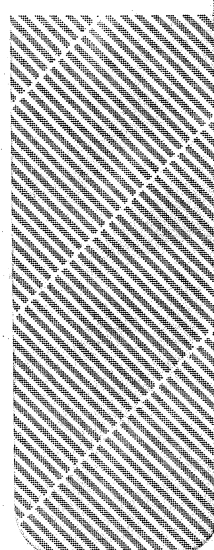
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OAKLAND CA 946

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SAVER



Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389
att: Volunteer Planning

Yosemite National Park

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U.S. Department of the Interior



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TR-5-309

Yosemite National Park

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Name: Stan Petersen

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9/1/06

Comment: Tuolumne Meadows Plan

Address: [REDACTED] - Mariposa, Ca. 95338

Comments

The Tuolumne Meadows Plan should:

1. Respect the 1964 Wilderness Act and the Wilderness boundaries within Yosemite.
2. Respect the intent if not ^{the} essence of the 1984, Wild and Scenic Rivers Act.
3. Consider Granite rock as fencing (ie; barriers), rather than other natural or unnatural materials.
4. Maintain the 'Rustic' character of structures. No additional permanent structures. Continue the 'principal' of tent structures.
5. Maintain no motorized vehicles in Winter.

(cont)

(continue comments on back of page)

6. Maintain the relative quiet serenity of Winter.

7. "Naturalize" non-designated 'trails'.

specifically:

a. The 'short-cut' trail to Glen Avlin
from area of Erratic Dome,

b. Pack animal trail up the north side / east side
of Lyell FK. of the Tuolumne River
from ^{the} Muir Trail bridge crossing.

8. Attempt to use existing sites for upgrading
management sites rather than seeking new sites,
as was done with the present D.N.C. Stables,
back in the 60's, when it was moved from Tuolumne
Meadows Lodge.

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TDR-5 - 310
YOSEMITE NATIONAL PARK

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Name: Alice Cantelow

Date of Comment: 8/31/06

Address: [REDACTED]

Placerville, CA 95667

Comments

Change Tuolumne Meadows campground to a walk-in campground. Or at least reduce density in B+C loops especially. Maybe just the A loop could be walk-in?

Keep walk-in first^{come 1st} served backpackers campground. It could use a few more sites. People camped between sites when it was full in Aug.

Keep Shuttle bus - it is great

Have a host who stops nighttime music etc. in campground. Again, all walk-in campground would be great!

Cantelow

Placerville, CA
95667

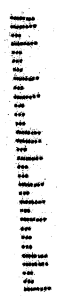
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Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA
95389

Planned

MARY CASSATT USA37



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TWSR-311-EIS

SEP 07 2006

P. 1072

YOSEMITE NATIONAL PARK

Tuolumne River Plan and Tuolumne Meadows Plan 2006

From: Joan Arsenault
Elkton, Oregon

September 7, 2006
To Superintendent
Attn: Tuolumne Planning
P.O. Box 577
Yosemite, CA 95389
FAX: 209/379-1294

I received your notice "A Plan for the Future" August 26 and have given the message a great deal of thought. I do keep informed about Yosemite planning and the future of our beloved park, but I was not aware of a planning process for Tuolumne Meadows. I just returned from T. Meadows on August 14, having spent a brief but wonderful visit, along with my daughter, at the Lodge. I participated in Chuck Waldeman's painting class (I do so almost yearly), while my daughter hiked along familiar trails. The Meadows are thus fresh in my mind.

The notice for the public site visit came far too late for me to join, and I have questions about your brief letter. What sort of planning is considered? Who is on the planning team? What are the park supervisor's concerns about the Meadows and river? I can only guess, and I will follow your list of questions.

What do you love about the Tuolumne River and T. Meadows areas? This is an easy question and any of us who love the Meadows area could go on about the wonderful light, the gentle meadows and granite domes, the copper colored water and wonderful skies and clouds, river edges and plants and flowers. The Meadows are like being on the top of the world, but a gentle world, approachable by auto and foot. Like the rest of Yosemite, the Meadows are loved and heavily visited, and the place is so special that people come back again and again. I can no longer backpack, but I can visit here and soak up the magic of the Sierras!

What areas should be targeted for restoration? I imagine the trails going across the meadows to the river and Parson's Lodge are of most concern for restoration. This trail is the most heavily used in the area - it is the first walk for our family when we arrive in the Meadows and our favorite at sunset. There are lots of paths across the meadow here and perhaps they should be marked more carefully. This seems to work in the Valley where people generally follow marked paths and where I have seen improvement in preserved meadow areas and river edges. Parking at this trailhead is limited. Do people use the free bus system as much as they should? Other parking areas in the Meadows are jammed as well, and there needs to be a better parking area at the Cathedral Lakes trailhead. Could parking be hidden behind the trees? Could parking be increased at the Visitors Center? It is great to see hiking so popular by folks of all ages and perhaps

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attention to parking and bus use should be improved. I do not object to mule use on the trails as I am a great advocate of the High Sierra camps and of the tradition of pack animals in the Park, but perhaps the animal use of some trails could be altered.

What facilities are or are not appropriate? I feel that camping and the Lodge are very important to the Meadows. Visiting the Meadows area is, after all, a wonderful human experience, and in years of staying at the Lodge I have talked to many visitors of all sorts who really value the hiking, the backcountry camps, and the Meadows themselves. The Lodge provides facilities for those who do not have time to camp (our situation this August) and offer the treats of comradeship and a good meal as well. We met folks who are setting out for an adventure and who have returned from one. I do not know whether campground stays are too long, but certainly the camp is full all the time. The campground seems adequate. The restrooms at the grill and market need more care.

What would you like to see protected? I do not have strong feelings on this issue. Perhaps small areas of botanical concern could be roped off from public footsteps and camping. Off limits areas should be very clearly marked. I am an amateur botanist in Oregon and I do realize the great thrill of finding special plants and places, and riverside areas need to be monitored for overuse. Again, I would like to be informed of areas of concern.

My husband and I truly love Tuolumne Meadows and the River. I first visited the Meadows in the early 1950's when we were students at Berkeley, newly married, and new to hiking. My husband had visited as a boy scout. We have introduced our grandson to the place in recent years, our fourth generation in Yosemite. We realize that crowds are a problem to the place, but I feel that the joys of the Meadows are still there. I know that protection is part of the Park responsibility, but please consider the human issues as well. The finest advocates for the Park come from visitors to T. Meadows.

Please keep me on your list of those interested in the Tuolumne River and Tuolumne Meadows Plan.



Joan Arsenault

[REDACTED]
Elkton, OR 97436
[REDACTED]
[REDACTED]

Yosemite National Park

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Public Comment Form

TUOLUMNE RIVER PLAN and TUOLUMNE MEADOWS PLAN

SEP 07 2006

TWBR-5-312
YOSEMITE NATIONAL PARK
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Name: Rachael Doctors
Comment: 9-02-06

Date of

Address: [REDACTED] Santa Barbara CA 93105

Comments

I have camped at Tuolumne for approx. 25 years & worked as a volunteer in the campground for the past several seasons, to date. My comments come from both perspectives.

Upgrading: ① More toilets are needed for current number of visitors. Those we have need re-furbishing & the addition of lighting for safety reasons.

② It would be useful to have dishwashing facilities at the toilets. The current requirements are difficult for campers & thus are often ignored. This results in food particles & soapy water being discarded on the soil.

③ A notice board (well lit) at the campground entrance, which clearly outlines the responsibilities, privileges & facilities for visitors. The Forestry Service does an excellent job of this.

Tracking- The duration of use for visitors during the summer season is two weeks.

(continue comments on back of page)

Pg 2 of 2

However, there is no tracking system to comply with this. Many people stay well beyond this time limit but at the same time many people are turned away because the camp is "full." I think that this is extremely unfair & needs to be remedied as soon as possible. A simple data-base management program could take care of this & also enable staff & law enforcement to locate people (campers) as needed.

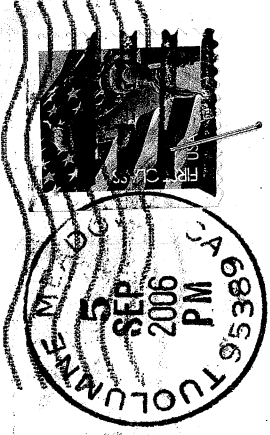
I talk on a one-to-one basis, to thousands of people, & their love & vision for Tuolumne is dear and close to my own. It is a place of peace & tranquility, where people can re-centre & re-charge. The casual & non-commercial aspect is very appreciated as is the informal layout of the campsites. The programs are well attended & valued for their close connection to the park & the wilderness.

One hears rumors of "doing away" with the A loop along the river. I think this would be a mistake. These sites are valued because of their proximity to the river & it's potential for enjoyment. For me the river means a changing symphony that plays both night & day. On a practical level, one third of the campsites would be lost, in a campground where ~~the~~ the demand already often exceeds the space available.

Thank you for reading this. If needed, I can be reached at [REDACTED] after October 5th.

Doctors
TMCG.
Yosemite Nat. Park
CA 95389

STOCKTON/STKN
CA 95211
06 SEP 2006 PM



The Superintendent
Yosemite Nat. Park
P.O. Box 577
Yosemite CA 95389



EIS

Tuolumne River/Meadows Plan

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YOSEMITE NATIONAL PARK

Re: "A Plan for the Future"

I want to begin these comments with the observation that people are shunning their participation in the EIS. One person in particular whom I talked to, Diane Kriletich, asked me if I received a notice for scoping comments on the Tuolumne River/Meadows Plans. I had. Likewise, she had, but she was loathe to respond because she had responded and followed the scoping process for the Valley and felt betrayed by it. I am in sympathy with her plight of feeling, having responded to numerous NEPA scoping processes with comments. For example, I responded a decade ago to the US Forest Service call for comments on the first ever scoping of an ER for a grazing allotment, namely the McDougald allotment. My comments zeroed on on the vulnerability of wildlife to diseases brought in by domestic agriculture: mad cow disease, blue tongue disease and wasting disease of elk. Among my salient points was surveillance and better paperwork of cattle that come and leave the allotment. The Forest Service did two things: if tok these public scoping comments and incorporated them into the ER, or it religated them to another paper that summarized each comment and named the reason why the comment was not included in the ER. My comments, though sent special delivery, were ignored – not included in either document. More than a decade has passed, mad cow disease has become a household word, the USDA is considering a universal animal identification system and my suggestions on surveillance has been adopted by the Forest Service where wasting disease of elk is concerned. In the final analysis, my comments were ignored; my content eventually adopted. I could chalk this up to the inability of the Forest Service ER team to do what this EIS proposes, plan for the future. Too much foresight will not register with the limited vision of government EIS/ER team. I tried to talk Diane into writing and sharing her comments, but in my heart, I am skeptical, I don't believe the process works or that the government has any intention of making it work. To the contrary, as with the DOE's hearings on nuclear issues, I think the deck is stacked and the cards manipulated to accomplish the purpose of a select minority of interests.

First, I want to address a question posed in the scoping notice: What facilities and services are or are not appropriate? I could list these misfits: high-rise structures over 23 stories high, firing ranges for the Sherman Antique Tank Association, a transmission tower for a proposed KNPS radio station, etc. Rather than state the obvious of approved and rejected services, I rather refer back to the time-honored vision of the Park Service, to preserve the natural and historic objects for the enjoyment of the people.

The decision whteher a facility or service is acceptable should be based on two decisions:

1. whether or not they are compatible with the preservation mission of the NPS
2. whether they add to the enjoyment of visitor.

Putting in a 9-hole golf course at Tuolumne Meadows does not add to the visitor's enjoyment of the meadows but replaces one pleasuring ground with another, replacing a natural object with a cultural object of pleasure. The experience of the meadows is not enhanced by a golf club; the presence of a 9 hole course would detract from the experience of others. The course could be located outside the park to effect a net gain in preservation and no net loss to the experience of the meadows. Obviously, a golf course is out of place.

How about a coke machine at a trail crossroads in the meadows? Is a Coke machine compatible with preservation or is it A vending machine would be out of character placed between a deer lily and a columbine; however, inside a rest room, or a visitor center, the same may aid the enjoyment of the visitor without compromising the preservation mission.

Preservation of the scenery is the first imperative of the mission; facilities and services that aid enjoyment must defer to the preservation mission of the Park Service.

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I'll repeat. The guiding philosophy is: preservation first, enjoyment second. Facilities and services are not authorized for the sheer pleasure of the visitor but support the enjoyment of what is preserved.

In other words, Yosemite is providing scenery, and providing for the enjoyment of that scenery. If a facility or service is not related to the enjoyment of the scenery, it is forbidden.

The sure-fire way of preservation is to lock up all the scenery and prohibit human contact. Close the gates of Yosemite and keep people out. Throw up no-trespassing signs. This is not the Park Service mission: the mission is preservation with use, but the use has to be impact-free so that the scenery, or in broader terms, the "resource," does not "degrade." Traditionally, the Park Service has managed use in two ways: by outlawing impacts that damage the resources and by concentrating the impacts.

For example, a hiking trail concentrates impacts. We can imagine a trail as a destination device, it gets people from point A to point B. There could be three routes, X, Y and Z, and X and Y are unsafe, jeopardizing hikers. If Z traverses a field of endangered *Belooga* berries, and without the trail, hundreds of feet will cross helter-skelter and trample the Beautiful *Belooga* in bloom, the Park Service must resort to trail X or Y, or invent trail Z to minimize the pressure on *Belooga* Berry so that it survives as a natural object. The trail is sacrificial, allowing use within preservation. If Trail Z fails to concentrate use so that the *Belooga* is at risk, well...the only choice may be to lock it up until a compatible use is found.

Trails concentrate impacts of use, effecting preservation. Yosemite can tolerate trails for the sake of preservation with use. The choice of management is between preservation with use, or no use. If a resource has a half-life because of use, the type of use does not belong in the park.

These comments are general comments, not specific to Tuolumne Meadows or the River.

I want to comment specifically on some considerations of designing, managing and maintaining trails in Tuolumne Meadows and the River.

First users: who are the users of trails? The user can be described and defined by the mode of transport used to move along the trail. Horse traffic, wheelchair traffic, hikers and runners, or motorcycles, sleds, mountain bikes, skis.

Users may also be defined by the means of enjoying the scenery: eyes, binoculars, cameras...technologically aided eyes. Or the objects of enjoyment, what the user sees and hears. Bird-watching, as opposed to identifying rare wildflowers or exploring the the geology of an area by eye.

Users can also be classified by their destinations. Loop hikers, overlook hikers, backpackers.

On August 13, I ran from Tenaya Lake to the Valley, a run I try to do once a year. What services and facilities make this scenic run enjoyable for me?

Well-marked trails, of course. This year I missed a turn in a Forsythe trail where the trail V'd or double-back. I jogged about a 100 yards off course before I came to a dead-end at a meadow. Then, doubling back, I had to search for the trail. I was not the only one to miss the turn-off, because the spur I jogged on was pocked with footprints of others who had gone the same way. No cairns marked the turn, and where I ran straight, the trail turned sharply right across granite rock and really wasn't visible. At the turn, run-off chuted straight making the trail look as though no turn were there. Words are feeble to make this description come to life, but the image is lucid: the trail appeared to go straight so I ran straight, but the trail actually V'd right over rock surfaces and was hidden, not only to me as a runner but to hikers using the same trail. Impacts were not concentrated; the trail failed by design, and users were sidetracked. No big deal, but trail standards are higher for Yosemite than elsewhere. I expect better trails in National Parks than I do National Forests. I also know that if an August snow had fallen, even hikers would get lost at this false turn. Even though my safety wasn't compromised, I know the bad design created a potential hazard.

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My plans next year are for a run that starts at Tuolumne Meadows. I must start earlier in the day, extra time to accommodate the false turns, and starting earlier means increasing the risk of bear or big cat encounters. If I could count on good maintenance and good design of the trail, I could start later in the day.

I am something of a destination runner because I can't carry sufficient water for my needs, so long runs in Yosemite – and I've tried other routes – invariably take me to Vernal Falls where I can drink water. Some destination hikers head to Half Dome, some head to Nevada Falls. I encountered two runners running to Cloud's Rest, "destination" runners as opposed to "endurance" runners on the trail.

I would never go the Cloud Rest route because the declivities and drop-off's are too dangerous. And if I designed the Tuolumne Meadow/River trails, I design them to suit runners.

When I run, I stop for wildflowers, I like obstacles, but I want visible trail treads. I don't want to guess which direction the trail turns, I don't want to be misled to run the wrong way.

An appreciation of Yosemite on the run is very much a service that should be provided by the park. More attention to the running aspects of trails is needed. Trails need to accommodate both hikers and runners, or at least some trails need to be designed with runners in mind.

Comments of Bud Hoekstra, [REDACTED] San Andreas, CA 95249

Bud Hoekstra

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TWSR-314-815
SEP 07 2006P. 181
YOSEMITE NATIONAL PARK**FAX TRANSMISSION****TO:** Superintendent, Yosemite National Park. Box 577, Yosemite, CA 95389.**FAX #** (209) 379-1294**FROM:** Richard Reid. Address: [REDACTED], Whittier, CA 90602**DATE:** September 6, 2006**PUBLIC COMMENT FORM:****TUOLUMNE RIVER PLAN AND TUOLUMNE MEADOWS PLAN**

On a recent hike along the John Muir Trail from Donahue Pass to Tuolumne Meadows, I was saddened and shocked by the amount of damage that is caused by the mules and horses to the meadows and streams of Lyell Canyon.

The meadow trails are pockmarked by the deep imprint of hooves. When the soil is soft and muddy, the horse or mule hooves can sink in up to 24 inches. The next horse or mule in the line (who is no fool!) moves to the side of the hole caused by the previous animal and a new groove or trail is cut into the meadow. The animal hooves cause far more damage than hiker foot traffic.

Next, the large amount of fecal material and urine from these animals that is dropped on the trail washes into nearby streams. It not only causes a green tinge in the streams and lakes of the Lyell Fork due to algae, but also may contribute to the presence of giardia (which horses are apparently capable of passing through their bodies).

I would like to recommend that all horses and mules be banned from the John Muir Trail between Donahue Pass and Rafferty Creek.

Let's preserve one of our most valuable national assets--the meadows and streams of the high country of Yosemite National Park.

Thank You.

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[REDACTED]
Palo Alto, CA 94306
August 30, 2006

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TWSR-315-215
SEP 07 2006
P. 184
YOSEMITE NATIONAL PARK

Superintendent
Yosemite National Park
Attn: Tuolumne Planning
PO Box 577
Yosemite, CA 95389

Dear Sir:

I wish to submit the following comments and suggestions as part of the public scoping process for the Tuolumne Wild and Scenic River Comprehensive Management Plan & Tuolumne Meadows Plan. I have visited Tuolumne Meadows regularly since 1967, hiking and backpacking the area extensively.

1. Preserve Tuolumne Meadows as a meadow by hydrologic means.

Remedy the effects of roads (Tioga, Soda Springs, Tuolumne Lodge) on drainage into the meadow.

Remove unneeded road sections (e.g. Soda Springs).

Install additional culverts.

Consider the feasibility of restoring/altering the river channel to raise the water table.

In his time, John Muir described Tuolumne Meadows as being green in August. Now the meadow is generally brown by late July, indicating that it has dried out substantially in the past century and a half. If the impressive viewscape and meadow habitat are to be preserved, hydrological work needs to be done to raise the water table in the meadow.

2. Remove encroaching lodgepole pines from the meadow.

Both saplings and some larger trees should be cut and removed.

In the forty years that I have visited Tuolumne Meadows, it has been obvious to me that pines have steadily encroached on to the meadow. If allowed to continue, this forestation will further dry the meadow, irreversibly converting it to a forested flat. Artificially removing trees in this non-wilderness area is well

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justified as a means of preserving this spectacular sub-alpine meadow and the habitat it provides.

3. Remove exotic vegetation, using volunteer labor wherever possible. Use environmentally compatible methods, including hand-applied herbicides.
4. Keep most of the meadow open to walkers. Restore heavily-impacted areas by decompacting soil, replanting and reseeding, using volunteer labor where possible.

Since this is not a designated wilderness area, active maintenance of the landscape is desirable and should be legally permissible.

5. Tuolumne Meadows Visitor Services.

Remove gas station.

Remove Visitor Center and consolidate information services at one location convenient to the campground and lodge, perhaps the existing Wilderness Office.

Retain the Store and Mountaineering Shop, perhaps consolidating them.

Retain the Post Office and Grill, perhaps consolidating all these canvas-structure operations into one permanent building.

Visitor services in Tuolumne Meadows are useful to day visitors, guests at the lodge, campers in the campground and especially to backpackers and thru-hikers for whom this is a critical re-supply point. Services should be made more walker-friendly by consolidating them near the campground and lodge. The present Visitor center seems little used and should be removed. Information could be provided at other locations.

6. High Sierra Camps.

Retain the High Sierra Camps, but with a more austere level of service at the backcountry camps.

Reduce or eliminate pack stock and equestrian access to the camps.

Employ human porters in the Appalachian Mountain Club tradition.

Encourage guests to carry camp supplies in their backpacks by offering rate discounts.

Restore and maintain heavily-impacted areas in the immediate vicinity of the camps.

The High Sierra Camps provide a valuable introduction to the Yosemite high country for families and visitors who lack backpacking experience or ability. My own first exposure to the high country was at the High Sierra Camps in 1967. It was a revelation.

Unfortunately, the pack stock that supply these camps have made a mess of trails and have damaged meadow areas, particularly at higher elevations.

Reducing or eliminating pack stock and equestrian traffic to these camps should be a high priority. Demand for guest accommodations at these camps currently far exceeds supply, so a moderate reduction in services and amenities should be tolerated by guests. Resupply and maintenance logistics could be modeled after the Appalachian Mountain Club huts and the Swiss Alpine Club huts. Equestrian access should be eliminated or restricted to guests with documented handicaps.

7. Pedestrian and Transit Oriented Initiative.

Implement a system in which most overnight visitors to Tuolumne Meadows would leave their vehicles at remote staging sites (e.g. Lee Vining, Yosemite Valley, Crane Flat) and travel to Tuolumne Meadows by bus.

An ongoing concern in Yosemite is the problem of excessive private vehicle traffic. Plans for visitor accommodation should facilitate transit access and provide incentives for its use, while discouraging private vehicle use. (The Tuolumne Meadows shuttle bus system, a commendable current effort in this direction, is sadly under utilized because visitors have little incentive to use it.) A staging site in Lee Vining could provide an economic benefit to that gateway community.

8. Tuolumne Meadows Campground

Convert much of the drive-in campground to walk-in camping. Make walk-in camping available not only to backpackers with wilderness permits, but also to others staying one night or multiple nights. Encourage visitor access by shuttle buses. Provide limited high-density parking, perhaps in the existing Lumbert Dome-Soda Springs area, on a fee basis.

The present Tuolumne Meadows Campground is an unattractive RV-car camper slum. Converting much of the existing campground to walk-in camping would accommodate more visitors in a smaller area with less impact.

9. Backcountry Use: Re-examine "no camping" zone restrictions in the Tuolumne Meadows Area.

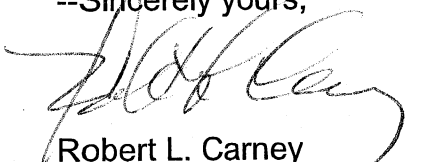
There is currently a four-mile "no camping" corridor along Tioga Road in the Tuolumne Meadows area. This arbitrary and needless restriction should be replaced with a narrower (e.g. one-mile) corridor, together with site specific closures of particularly vulnerable or heavily impacted areas.

The current "no camping" restriction on the whole Dana Fork watershed was apparently imposed to help protect the water supply from pollution. I believe this restriction is obsolete and unnecessary. Removing this restriction would open some fine high country to backpackers and could reduce impact on the heavily-visited Lyell Fork.


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p. 4 of 4

I hope that the above comments are useful to you in the planning process.

--Sincerely yours,



Robert L. Carney

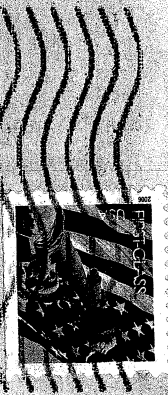


Robert Carney

Palo Alto, CA 94306

SAN FRANCISCO CA 941

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Superintendent
Yosemite National Park
Attn: Tuolumne Planning
PO Box 577
Yosemite, CA 95389

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Yosemite National Park

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Public Comment Form TUOLUMNE RIVER PLAN and TUOLUMNE MEADOWS PLAN

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Yosemite National Park

Pg 1 of 2

All interested individuals, organizations, and agencies are invited to provide written ideas, concerns, or suggestions during the public scoping period, which closes September 7, 2006. Written comments may be mailed to: Superintendent, Yosemite National Park, P.O. Box 577, Yosemite, CA 95389 (Attn: Tuolumne Planning). Written comments may also be faxed to: 209/379-1294. Electronic comments may be emailed to: Yose_Planning@nps.gov (in the subject line type: Tuolumne Planning). Comments can also be submitted online by going to parkplanning.nps.gov/yose. Keep track of project status by regularly visiting the park's web site at www.nps.gov/yose/planning/trp.

Note: Anonymous comments will not be considered. Generally, The National Park Service will make available to the public for inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses. Individuals' addresses will be withheld from publication of comments, however names may be made available.

I		4	M	X				
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Name: J. Schneider

Date of Comment: 9/6/06

Address: [REDACTED] Rancho Cordova, CA 95741

Comments

Tuolumne

After spending a week in Tuolumne Meadows campground, I would suggest the following for the campground.

- #1- raise the bear boxes off the ground. For someone with a bad back, the low boxes made it difficult to get in/out of them. AND make them BIGGER!!
- #2- Relocate the boxes to the most shady spot on ~~the~~ each campsite, that way they don't get hot during the midday sun.
- #3- Make showers at Tuolumne Lodge available during morning and afternoon hours
- #4- Provide ~~SHO~~ unlimited showers during stay for one flat rate, in conjunction w/ #3.

#50 (REDACTED)

Next page over →

- #5 - Allow users to pre select a campsite when booking reservation
- #6 - Provide "day use only" parking access near Tule River along Section "A" Camping
- #7 - Install lights in restrooms - solar powered perhaps.
- #8 - Reposition bear boxes away from exposed rocks. On site A-42, there are 2 rocks that ~~are~~ ~~are~~ in front of the bear box that I stumbled over many times.

P.S. - Great Campfires @ Dana. Margaret Eissler is an amazing storyteller. Her stories on Coyote man & bear man were informative & entertaining.

thanks -

JDO

J. Schneider

██████████
Rancho Cordova CA
95741

SACRAMENTO CA 957

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Superintendent
Yosemite National Park
PO BOX 577
Yosemite, CA 95389

ATTN: Tolerance Planning





Defending the Planet One Beat at a Time

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TWSR-317-EIS
SEP 07 2006
P.1812
YOSEMITE NATIONAL PARK

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September 5, 2006

National Park Service
Superintendent Yosemite National Park
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Phone: 209.372.0200

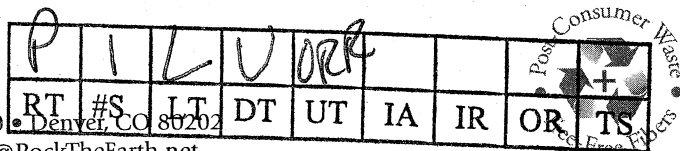
Re: Tuolumne Wild and Scenic River Comprehensive Management Plan

Dear Superintendent:

The members of Rock the Earth, a national nonprofit corporation, hereby submit comments on the proposed scope of the forthcoming Tuolumne Wild and Scenic River Comprehensive Management Plan (Tuolumne Management Plan) and Tuolumne Meadows Concept Plan for Yosemite National Park, California. It is our opinion based on current law and regulations, along with a wealth of technical, economic and sociological data, that the National Park Service (NPS) should consider certain alternatives in developing the forthcoming Management Plan for the Tuolumne River (the River). Specifically, it is our position that alternatives that should be considered within the scope of the forthcoming Management Plan must include a thorough review of the operation of the O'Shaughnessy Dam and consideration of the restoration of natural flows to the Tuolumne River.

I. Rock the Earth.

Rock the Earth ("RtE") is a Pennsylvania nonprofit corporation, with a national membership of concerned citizens. Like many other Americans, RtE members regularly seek the peace, quiet, and solitude of the national public lands for recreational, artistic, naturalist, and spiritual activities, including but not limited to hiking, camping, skiing, non-motorized water sports, photography, and meditation. Our members regularly utilize the Yosemite Valley and Tuolumne River and will be directly affected by the forthcoming Plan as it will allow for changes in the way that the River is managed. Its members will be directly affected by the forthcoming Management Plan in that a decision by the NPS without considering the Hetch Hetchy Reservoir and O'Shaughnessy Dam will diminish visitors'/members' ability to experience the Tuolumne River and Yosemite National Park (Yosemite) in its natural state, thereby reducing visitor enjoyment.



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Rock the Earth members have several grounds for concern. Since the Tuolumne River is inextricably tied to the operation of the O'Shaughnessy Dam, the operation of the Dam must be considered when reviewing any determination as to the River's Wild and Scenic Status. Furthermore, a restoration of the natural flows to the River would add an outstanding remarkable value thereby enhancing the River's quality as a Wild and Scenic River. Finally, based on current and applicable law, regulations and policies, the restoration of natural flows to the River must be considered.

II. Removal of the O'Shaughnessy Dam would return the natural flow of the Tuolumne River and add a valuable Outstandingly Remarkable Value thus enhancing the river's quality as a Wild and Scenic River.

The Tuolumne River drains approximately 428,115 acres of northern Yosemite and flows into the Hetch Hetchy Reservoir where water is diverted through Canyon Tunnel to the Kirkwood Powerhouse.¹ Water not diverted continues downstream in the Tuolumne River channel.² Removal of the O'Shaughnessy Dam would restore the character and downstream ecological functions³ of the Tuolumne River and enable the 8-mile stretch encompassing the Hetch Hetchy Reservoir to be added to the Wild and Scenic River System.⁴ Therefore, the Hetch Hetchy Reservoir and O'Shaughnessy Dam should be considered as part of the Tuolumne Management Plan because either the status quo or removal of the Dam will impact the Tuolumne River.

Since 1984, 83 miles of the Tuolumne River has been designated as wild and scenic under the Wild and Scenic Rivers Act. The Tuolumne River flows through numerous beautiful landscapes, is home to countless species, and provides many recreational opportunities. The Hetch Hetchy Valley is perhaps the most spectacular part of the Tuolumne's course. Creating a management plan for the Tuolumne River without considering the Hetch Hetchy Reservoir or O'Shaughnessy Dam ignores a vital part of what makes the Tuolumne River exceptionally scenic, recreational, and historic. Five years after removal of the O'Shaughnessy Dam, there would be vigorous growth along the Tuolumne River including trees up to 10 feet high.⁵ Ten years after removal of the O'Shaughnessy Dam, a truly natural setting with native plants, grasses, wildflowers, and relatively tall trees would exist along the Tuolumne River.⁶ Fifty years after removal of the O'Shaughnessy Dam, the Hetch Hetchy Valley would be an established relatively

¹ Yosemite National Park Hydrology and Watersheds, last modified Dec. 22, 2004, at http://www.nps.gov/yose/nature/wtr_hydrology.htm.

² Id.

³ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 30 (2006) at <http://www.hetchhetchy.water.ca.gov/>.

⁴ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Appendices, D-3 (2006) at <http://www.hetchhetchy.water.ca.gov/>.

⁵ Restore Hetch Hetchy, Frequently Asked Questions at <http://www.hetchhetchy.org/faq.html>.

⁶ Id.

mature ecosystem much like Yosemite.⁷ The possibility of restoration of this section of the Tuolumne River should be considered for all Tuolumne River management plans.

Furthermore, the Hetch Hetchy Valley is an outstandingly remarkable value of the Tuolumne River. The purpose of the Wild and Scenic Rivers Act is preservation of selective rivers possessing outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values in free-flowing condition and protecting such rivers and their immediate environments for the benefit and enjoyment of present and future generations.⁸ And, being as the purpose of the Wild and Scenic Rivers Act is preservation of rivers possessing outstanding scenic and historic qualities, the section of the Tuolumne River through the Hetch Hetchy Valley, one of four glacially-carved valleys in California, should be included in the Tuolumne Wild and Scenic River designation.⁹ The Hetch Hetchy Valley also has many other outstandingly remarkable values including a flat valley floor with expanses of meadows and forests, tall waterfalls that vary from misty to thundering, meandering river, and vertical granite walls with heights in excess of 1,000 feet.¹⁰ In addition, Hetch Hetchy is at the transition from foothills to montane habitats thus provides habitat to a larger number of plant and wildlife species than Yosemite.¹¹ Thus, a restored Hetch Hetchy Valley should be considered as an outstandingly remarkable value for the Tuolumne River management plan.

Moreover, consideration of the Hetch Hetchy Reservoir and O'Shaughnessy Dam should be part of the Tuolumne Management Plan as a step toward a federal O'Shaughnessy Dam removal analysis. Removal of the O'Shaughnessy Dam and restoration of the Hetch Hetchy Valley has been under government consideration since 1987.¹² In 1988, under Secretary of the Interior Donald Hodel's direction, the Bureau of Reclamation completed a preliminary study for the National Park Service outlining several possible scenarios for restoring Hetch Hetchy Valley.¹³ As stated by Secretary Hodel, "Restoration of Hetch Hetchy Valley to its natural state may be a dream, but it is our obligation as concerned Americans to discover if this dream can become a reality."¹⁴ In 2004, Governor Schwarzenegger directed the California Department of Water Resources (DWR) and Department of Parks and Recreation (DPR) to review Hetch Hetchy

⁷ Id.

⁸ 16 U.S.C.S. §§ 1271-1287.

⁹ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

¹⁰ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 41 (2006) at <http://www.hetchhetchy.water.ca.gov/>.

¹¹ Id.

¹² Bureau of Reclamation, Hetch Hetchy: Water and Power Replacement Concepts, February 1988 at http://www.hetchhetchy.org/pdf/reclamation_water_replacement_body.pdf.

¹³ Restore Hetch Hetchy, Our Proposal at <http://www.hetchhetchy.org/proposal.html>.

¹⁴ Id.

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Tuolumne Wild & Scenic Comprehensive Management Plan
September 5, 2006
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restoration studies.¹⁵ The DWR and DPR did not make a formal recommendation about next steps but did state restoration of the Hetch Hetchy Valley is “technically feasible” and would require federal participation.¹⁶ Therefore, NPS should begin consideration of Hetch Hetchy Valley restoration as part of the Tuolumne Management Plan because the Tuolumne River will receive the main impact of dam removal.

III. NPS Mandates Require That Natural Flows Be Restored To The Tuolumne River.

The fundamental purpose of the National Park System as set forth in the Organic Act, 16 USC 1, 2-4, and reaffirmed by the General Authorities Act, 16 USC 1a-1 through 1a-8, *as amended* (“Organic Act”), mandates the conservation of park resources and values. The Organic Act of 1916, *as amended*, states in Section I:

The Service thus established shall promote and regulate the use of the Federal areas known as the National Parks....by such means and measures as to conform to the fundamental purposes of the said Parks...which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such a manner and by such means as will leave them unimpaired for the enjoyment of future generations.

16 USC 1, 2-4. Likewise, the General Authorities Act, as amended by the Redwood Act (March 27, 1978, P.L. 95-250, 92 Stat. 163, 16 U.S.C. 1a-1) (“General Authorities Act”), affirms the basic tenets of the Organic Act and provides additional guidance on National Park System management:

The authorization of activities shall be construed, and the protection, management and administration of these areas shall be conducted in light of the high public value and integrity of the National Park system and shall not be exercised in derogation of the values and purposes for which these various areas have been established.

16 USC 1a-1 through 1a-8, *as amended*.

Therefore, based on the Organic Act and the General Authorities Act, both of which demand that areas designated as National Parks be conserved, preserved and that uses contrary to these principals must not be allowed, NPS should review the wealth of technical and anecdotal evidence as to the effect the O’Shaughnessy Dam has had on the appropriate management of the Tuolumne River.

¹⁵ California Dept. of Water Resources/Dept. Of Parks and Recreation, Study Objective at <http://www.hetchhetchy.water.ca.gov/>.

¹⁶ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 50 (2006) at <http://www.hetchhetchy.water.ca.gov/>.

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As set forth in Section II, the Tuolumne Management Plan fails to comply with both the legal mandates and directives cited above by not considering the Hetch Hetchy Reservoir and O'Shaughnessy Dam. Restoration of the Hetch Hetchy Valley will affect the Tuolumne River as will maintaining the O'Shaughnessy Dam in its current condition. Therefore, NPS should consider the Hetch Hetchy Reservoir and O'Shaughnessy Dam as part of the Tuolumne Management Plan.

IV. Restoration of Hetch Hetchy Valley is Technically Feasible

Over a dozen technical studies have been conducted in the past two decades relating to the restoration of Hetch Hetchy Valley. In the late 1980s, the Federal and State governments released a series of reports in response to a request from then-Secretary of the Interior Donald Hodel. In recent years, four additional reports have been released, two from advocacy groups and two masters' theses. These studies varied widely in their focus, methodologies, and conclusions.

In an effort to establish a consistent basis for evaluating the existing literature, DWR and DPR released a report in July, 2006 which consolidated and assessed the information and analyses developed in the earlier reports.¹⁷ This "Study of Studies" concluded that the research and analyses completed to date are not sufficiently comprehensive or detailed to reach firm conclusions or set public policy. However, the report did not identify any "fatal flaws in the restoration concept that would preclude additional study,"¹⁸ and stated that "[i]t does appear technically feasible to restore the Hetch Hetchy Valley."¹⁹ The study further asserted that the State of California cannot lead all future investigations, and "Federal participation will be important to help shape future studies" and to work with all involved stakeholders.²⁰

RtE agrees with DWR/DPR's conclusions regarding the feasibility of this effort, and our own review of the available literature strongly suggests that Hetch Hetchy Valley restoration is technically feasible and worthy of additional study. RtE urges NPS to take the initiative toward recovering this natural wonder by evaluating Hetch Hetchy Valley restoration options as part of the Management Plan, in accordance with its legal obligations as described in Sections II and III of this letter.

The technical challenges of restoring natural flow to the Tuolumne River fall into four broad categories: dam removal, ecosystem restoration, water supply replacement, and power

¹⁷ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

¹⁸ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 3, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

¹⁹ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 50, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

²⁰ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 5, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

capacity replacement. The following paragraphs summarize the relevant project components, and discuss the technical feasibility of each.

Removal of O'Shaughnessy Dam

It will be necessary to demolish and remove O'Shaughnessy Dam in order to restore Tuolumne River to its natural flow. The most detailed proposal for demolition options to date envisioned a project that would proceed according to the following outline:²¹

- Construct a conveyor from the dam site to a staging area near Camp Mather. This would minimize truck traffic on Hetch Hetchy Road.
- Upgrade Evergreen Road and Hetch Hetchy Road to accommodate the necessary traffic loads.
- Divert the Tuolumne River via the installation of a temporary cofferdam upstream of O'Shaughnessy Dam, which would transfer the flow into a pipe system that would discharge downstream of the current dam site.
- Deconstruct O'Shaughnessy Dam using controlled blasting, diamond-saw cutting, hydraulic ramming, or another appropriate engineering technique or combination of techniques.²² Dam removal would be to the original level of the river bed. The dam's footing extends 118 feet below the original river bed. This lower portion of the dam should be left in place to allow the river to return to its natural flow pattern and prevent excessive erosion.²³
- Remove the cofferdam and restore natural river flow.
- Conduct restoration of the dam site and other disturbed areas.

To date, over 400 dams have been demolished and removed in the United States, albeit at a smaller scale than O'Shaughnessy Dam.²⁴ It is RfE's opinion that, building upon past experience with dam removal, demolition of O'Shaughnessy Dam to restore natural flows to Tuolumne River is technically feasible.

Ecosystem Restoration

Restoration of the valley ecosystem could be allowed to occur naturally, or could be subject to moderate or intensive management. In 1988, NPS prepared a study of the likely sequence and time frame of ecosystem recovery under each of three scenarios that could be

²¹ Restore Hetch Hetchy, *Finding the Way Back to Hetch Hetchy Valley: A Vision of Steps to Restore Hetch Hetchy Valley in Yosemite National Park and to Replace Water and Energy Supplies*, 11 – 18, September 13, 2005, at <http://www.hetchhetchy.org/studies.html>

²² California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 22, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

²³ National Park Service, Alternatives for Restoration of Hetch Hetchy Valley Following Removal of the Dam and Reservoir, Assumption 1, 1988, at http://www.sierraclub.org/ca/hetchhetchy/nps_hh_restoration.pdf

²⁴ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 23, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

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implemented after dam removal.²⁵ In developing these recovery scenarios, NPS anticipated that the need for sediment removal would be minimal to nonexistent, and that the river would return to its original flow channel naturally.²⁶

Under the no-management scenario, the reservoir would be drained in a single year. Vegetation and wildlife would be permitted to re-occupy the valley without human intervention. Over the course of 150 years under this scenario, most flora present in the valley prior to inundation would return, though the mix of vegetation would differ. In particular, the black oak recovery would be inhibited by the lack of a viable source of seeds located near the valley. All species of wildlife currently active in the Hetch Hetchy region would be re-established.²⁷

With moderate management, the five years prior to initiating reservoir drainage would be spent collecting native plant seeds for reintroduction to the valley ecosystem. The reservoir would then be drained over a five year period. As land was exposed during this period, NPS staff would plant a mixture of local plant species, including abundant black oaks. As the vegetation matured, prescribed burning would be used as needed to encourage the spread of oaks and meadows. If necessary, individual animals would be captured and brought to the valley to maintain an appropriate mix of species. Under this scenario, in 150 years the ecosystem would be restored to much the same state as before the valley was flooded.²⁸

The intensive management scenario would begin in a similar fashion to the moderate management scenario, with five years of seed gathering and progressively draining the reservoir over a five-year period. This scenario would also involve continued plant propagation and the suppression of some non-native plants. As under the second scenario, controlled burning and animal relocation would be employed as needed. In 150 years, this scenario would derive similar results to the moderate management scenario, with the primary exception that the concentration of black oaks would more closely resemble that originally found in Hetch Hetchy Valley.²⁹

Under any of these three scenarios, the ecosystem of Hetch Hetchy Valley would ultimately return to a wild state, populated by an abundance of regional plant and animal life, and exhibiting its inherent natural beauty.

²⁵ National Park Service, Alternatives for Restoration of Hetch Hetchy Valley Following Removal of the Dam and Reservoir, 1988, at http://www.sierraclub.org/ca/hetchhetchy/nps_hh_restoration.pdf

²⁶ National Park Service, Alternatives for Restoration of Hetch Hetchy Valley Following Removal of the Dam and Reservoir, Assumptions 2 and 3, 1988, at http://www.sierraclub.org/ca/hetchhetchy/nps_hh_restoration.pdf

²⁷ National Park Service, Alternatives for Restoration of Hetch Hetchy Valley Following Removal of the Dam and Reservoir, 5 - 9, 1988, at http://www.sierraclub.org/ca/hetchhetchy/nps_hh_restoration.pdf

²⁸ National Park Service, Alternatives for Restoration of Hetch Hetchy Valley Following Removal of the Dam and Reservoir, 9 - 12, 1988, at http://www.sierraclub.org/ca/hetchhetchy/nps_hh_restoration.pdf

²⁹ National Park Service, Alternatives for Restoration of Hetch Hetchy Valley Following Removal of the Dam and Reservoir, 12 - 14, 1988, at http://www.sierraclub.org/ca/hetchhetchy/nps_hh_restoration.pdf

Water Supply

The principal function of O'Shaughnessy Dam and Hetch Hetchy Reservoir is to provide a source of drinking water for the City of San Francisco and other municipal customers in the Bay Area. The reservoir supplies 220 million gallons of drinking water per day, to over 2.4 million Bay Area residents, and accounts for about 85% of San Francisco's total water demand.³⁰ Any plan to restore the valley must ensure continuity and quality of San Francisco's water supply.

Numerous approaches to maintaining the existing supply of water after draining Hetch Hetchy Reservoir have been proposed. Many involve simply establishing new ways of diverting the same water that is currently retained by O'Shaughnessy Dam. Others involve expanding existing water supplies, or developing currently unused sources.

The following water supply replacement scenario was proposed by Restore Hetch Hetchy (RHH), a grassroots nonprofit organization that advocates the removal of the dam and restoration of Hetch Hetchy Valley.³¹

- > Divert water from below the dam site into the Canyon Tunnel – This operation would occur one-half mile below the current dam site, and would be almost imperceptible to visitors to the restored valley. Several different configurations were proposed. This would provide enough water to meet demand during typical years, though a shortfall could exist in dry years.
- > Pump water from below the Holm Powerhouse on Cherry Creek into the Mountain Tunnel – Even in dry years, this modification would provide enough additional water to replace all but 5% of the existing water supply.³² Implementing this project would also provide additional electric power.

The above represents just one feasible scenario for ensuring adequate water supplies after removal of O'Shaughnessy Dam and restoration of natural flow to Tuolumne River. Several other water supply options have been proposed. One or more of these could be used to supplement the above scenario to ensure 100% replacement of water supply even in the driest years, or could be used as alternatives to the previously described scenario.

- > Increase water use efficiency (conservation) and wastewater reclamation – By establishing enhanced water conservation programs, the City of San Francisco and

³⁰ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 6, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

³¹ Restore Hetch Hetchy, *Finding the Way Back to Hetch Hetchy Valley: A Vision of Steps to Restore Hetch Hetchy Valley in Yosemite National Park and to Replace Water and Energy Supplies*, 21 - 29, September 13, 2005, at <http://www.hetchhetchy.org/studies.html>

³² Restore Hetch Hetchy, Refuting the Myths About Hetch Hetchy, at <http://www.hetchhetchy.org/myths.html>

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- other customers of the Hetch Hetchy water system could replace the water supply shortfall in dry years.³³
- Construct an intertie from the Don Pedro reservoir into the Foothill Tunnel – This tunnel runs directly below the reservoir, so a direct connection is possible, which could supply up to 400 cfs of water.³⁴
 - Enlarge Don Pedro Reservoir – Enlarging the dam could replace all of the storage capacity from Hetch Hetchy Reservoir, and would provide additional power. This could be implemented in conjunction with the intertie to the Foothill Tunnel described above. This option would require the construction of a saddle dam between Don Pedro and Exchequer Reservoirs.³⁵
 - Enlarge Calaveras Reservoir and construct a fourth San Joaquin Valley Pipeline – This dam is no longer considered safe, and must be replaced. Currently, the City of San Francisco is planning to replace it with a dam of the same size. Earlier proposals called for a larger dam, which would have increased the storage capacity of the reservoir at least fourfold.³⁶ Under this scenario, a new pipeline could be constructed to allow the larger reservoir to be filled from diverted Tuolumne River water. This is a viable option for replacing a portion of the water storage lost by removing O'Shaughnessy Dam. Since the City is already planning to replace the dam, the cost of the larger dam would be partly offset by previously-allocated funding for the Water System Improvement Project.³⁷
 - Develop new groundwater storage – Approximately 400,000 acre feet of groundwater storage in the Lower Tuolumne River Basin could be developed for use as backup water supply. During wet years, surplus water from the Don Pedro Reservoir would charge the aquifer, and in dry years, the stored water would supplement the reduced surface water flow.³⁸

The above list represents just a few of the water supply options that have been identified. Other options have been proposed by researchers over the past twenty years.^{39 40 41} Selecting the

³³ Restore Hetch Hetchy, *Finding the Way Back to Hetch Hetchy Valley: A Vision of Steps to Restore Hetch Hetchy Valley in Yosemite National Park and to Replace Water and Energy Supplies*, 22 - 27, September 13, 2005, at <http://www.hetchhetchy.org/studies.html>

³⁴ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 31, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

³⁵ Id.

³⁶ San Francisco Public Utilities Commission, Calaveras Dam Replacement Project - Fact Sheet, November 17, 2005, at http://sfwater.org/detail.cfm/MC_ID/15/MSC_ID/157/PRJ_ID/141/C_ID/2714.

³⁷ Restore Hetch Hetchy, *Finding the Way Back to Hetch Hetchy Valley: A Vision of Steps to Restore Hetch Hetchy Valley in Yosemite National Park and to Replace Water and Energy Supplies*, 31 - 35, September 13, 2005, at <http://www.hetchhetchy.org/studies.html>

³⁸ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 31, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

³⁹ Bureau of Reclamation, Hetch Hetchy: A Survey of Water & Power Replacement Concepts, February, 1988, at http://www.hetchhetchy.org/pdf/reclamation_water_replacement_body.pdf

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optimal approach would require significant further study. Nonetheless, it is clear that via some combination of the water replacement alternatives that have been proposed, it is technically feasible to ensure a continued supply of sufficient drinking water to meet demand after returning Tuolumne River to its natural flow.

Electric Power

In addition to supplying drinking water, O'Shaughnessy Dam provides hydroelectric power to the state electrical grid. Removing the dam would result in an energy loss of about 550 million kilowatt-hours per year in a median rainfall year.⁴² The generating potential is greater in wet years and lower in dry years. While substantial, this represents only about 0.2% of California's total energy demand.⁴³ Nonetheless, in the context of the energy shortages experienced by the state in recent years, a plan for restoring Hetch Hetchy Valley should include provisions for replacing as much of this lost power supply as possible.

Much of this shortfall could be recovered by diverting water in Cherry Creek from below the Holm Powerhouse into the Mountain Tunnel, which is also part of one water supply replacement scenario described above. This would generate approximately 160 kilowatt-hours/year of electrical power,⁴⁴ or nearly one-third of the total loss. Several of the other water-recovery options listed above could also provide additional power generation capacity. The remainder of the lost power could be replaced via financing increased energy efficiency programs, through the use of alternate power sources such as wind or solar, or as a worst-case option, by financing a portion of a new conventional fossil-fuel fired power plant.⁴⁵

Project Costs

RtE believes that, by implementing a mix of techniques that have previously been identified, restoration of natural flows to Tuolumne River, and thereby restoration of the natural beauty of Hetch Hetchy Valley, are technically feasible. We recognize that technically feasible does not mean cost effective. To date, sufficient information has not been developed to accurately quantify the costs associated with restoring Hetch Hetchy Valley and replacing the potentially

⁴⁰ Restore Hetch Hetchy, *Finding the Way Back to Hetch Hetchy Valley: A Vision of Steps to Restore Hetch Hetchy Valley in Yosemite National Park and to Replace Water and Energy Supplies*, September 13, 2005, at <http://www.hetchhetchy.org/studies.html>

⁴¹ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

⁴² Restore Hetch Hetchy, *Finding the Way Back to Hetch Hetchy Valley: A Vision of Steps to Restore Hetch Hetchy Valley in Yosemite National Park and to Replace Water and Energy Supplies*, 49, September 13, 2005, at <http://www.hetchhetchy.org/studies.html>

⁴³ Id.

⁴⁴ Id.

⁴⁵ Id., 50 - 54

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lost water and power supply.⁴⁶ In its "Study of Studies," DWR and DPR computed a rough cost estimate based upon information previously developed, and estimated a total project cost of \$3 billion to \$10 billion. DWR and DPR acknowledged that this cost estimate was based on incomplete data and included many conservative assumptions,⁴⁷ and some have disputed the estimate as grossly overstating the actual costs.⁴⁸

RtE concludes that the total project cost is simply unknown at this time, and this underscores the need for further study by NPS and others into the feasibility of the restoration effort. Further, the monetary costs of implementing this project should be weighed against the substantial benefits that would be realized by restoring natural flows to Tuolumne River and recovering the natural beauty of Hetch Hetchy Valley, as discussed in the next section.

VI. Restoration of Hetch Hetchy Valley Would Have Many Economic and Non-Economic Benefits

Restoring natural flows to Tuolumne River and recovering the natural beauty of Hetch Hetchy Valley would bring many benefits as well as imposing costs.

First, the aesthetic benefits, while impossible to quantify, are difficult to overstate. Recovering Hetch Hetchy Valley would restore a feature of outstanding natural beauty to the American landscape. Hetch Hetchy is similar geologically to Yosemite, and has often been compared to its more famous cousin in terms of its natural beauty.⁴⁹

Beyond the ineffable aesthetic benefits of restoring the valley, however, are some direct economic impacts that are subject to quantification, however imprecise. Restoring a second, Yosemite-like valley to the National Park System would create new recreational opportunities which could attract additional paying visitors. Depending on the level of development of the new resource, this "use benefit" could range from about \$15 million to \$25 million per year.⁵⁰

In addition to concrete financial benefits, so-called "non-use" benefits would be associated with the restoration project. This represents the value that the public places on the existence of a natural resource, even if they may never visit it. Studies have been conducted for

⁴⁶ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 42, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

⁴⁷ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 43, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

⁴⁸ Restore Hetch Hetchy, Response to the State of California Hetch Hetchy Restoration Study, at http://www.hetchhetchy.org/press/state_agrees_restoration_feasible.html

⁴⁹ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 38, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

⁵⁰ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 39, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

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other restoration projects in which households provided an estimate of their willingness to pay for the project. While such methodologies are inexact to say the least, existing data suggests that the "non-use" value of the project would be at least \$1 billion.⁵¹

Finally, from the perspective of the NPS, removal of O'Shaughnessy Dam and restoration of the Hetch Hetchy ecosystem could help the downstream ecology of Tuolumne River, helping to advance NPS's mission to preserve and improve the Tuolumne River Wild and Scenic River ecosystem.⁵²

VII. Conclusion

Based upon the above information, RtE concludes that a review of the operation of the O'Shaughnessy Dam and further study of the potential for removing the dam and restoring natural flow to Tuolumne River is not only justified by its technical feasibility, but is required by law.

Therefore, on behalf of the members of Rock the Earth, we strongly register our position that the NPS should, in developing the scope of the Tuolumne Management Plan, review the operation of the O'Shaughnessy Dam and consider restoration of the natural flow to the Tuolumne River.

Thank you for your consideration.

Sincerely,



Marc A. Ross
President and Executive Director
Rock the Earth

⁵¹ California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 40, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

⁵² California Dept. of Water Resources/Dept. Of Parks and Recreation, Hetch Hetchy Restoration Study: Report, 30, July 19, 2006 at <http://www.publicaffairs.water.ca.gov/newsreleases/2006/07-19-06hetchhetchy.cfm>.

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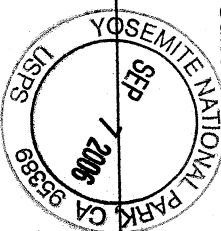
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Denver, CO 80202



National Park Service
Superintendent Yosemite National Park
P.O. Box 577
Yosemite National Park
California, 95389

Yosemite National Park

National Park Service
U.S. Department of the Interior



Public Comment Form

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TUOLUMNE RIVER PLAN and TUOLUMNE MEADOWS PLAN

All interested individuals, organizations, and agencies are invited to provide written ideas, concerns, or suggestions during the public scoping period, which closes September 7, 2006. Written comments may be mailed to: Superintendent, Yosemite National Park, P.O. Box 577, Yosemite, CA 95389 (Attn: Tuolumne Planning). Written comments may also be faxed to: 209/379-1294. Electronic comments may be emailed to: Yose_Planning@nps.gov (in the subject line type: Tuolumne Planning). Comments can also be submitted online by going to parkplanning.nps.gov/yose. Keep track of project status by regularly visiting the park's web site at www.nps.gov/yose/planning/trp.

Note: Anonymous comments will not be considered. Generally, The National Park Service will make available to the public for inspection all submissions from organizations or businesses and from persons identifying themselves as representatives or officials of organizations and businesses. Individuals' addresses will be withheld from publication of comments, however names may be made available.

Name: Patty Lundquist Date of Comment: August 28, 2006
Address: [REDACTED] Sacramento CA 95842

Comments

- We love the Tuolumne Meadows area and have been visiting there annually for nearly 30 years.
- ① Please maintain the current campground, Tuolumne Lodge, Tuolumne store and Grill, but do not add any more buildings.
 - ② Provide for scientific research on the affects of global warming on the flora and fauna and snowmelt/river runoff. This research is worth funding.
 - ③ No large unsightly structures such as "flux towers" should be allowed.
 - ④ We love this place the way it is, and want it to be maintained for future generations.
- P.S. We miss the bears!



Patricia Lundquist

Sacramento CA 95842

SACRAMENTO CA 957

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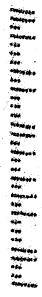


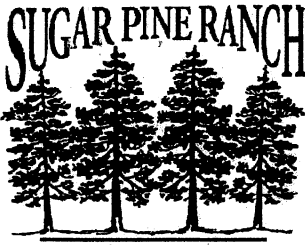
Superintendent, Yosemite National Park

P.O. Box 577

Yosemite, CA 95389

(Attn: Tuolumne Planning)





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YOSEMITE NATIONAL PARK

Groveland, CA 95321

September 7, 2006

Michael Tollefson, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

RE: Tuolumne River Plan and Tuolumne Meadow Plan Comments

Dear Mr. Tollefson:

Please accept my comments under scoping for the Tuolumne River Comprehensive Management Plan (TRP) and the Tuolumne Meadows Implementation Plan (TMP).

In addition to the following comments, I have submitted comments throughout the public meeting process, which I hope to also see taken into consideration. My comments below address key issues considered most critical.

- Please complete the Comprehensive Management Plan for the Merced River (MRP), and the Yosemite Valley Implementation Plan (YVP) before proceeding with the Tuolumne River and Meadows plans. Doing otherwise is the "Ready", "Fire", "Aim" scenario that waste time, money and manpower, and is avoidable by a good job of aiming before firing.
 - The Merced River and Yosemite Valley areas are vital to the over-all visitor experience and formulation of acceptable Yosemite National Park management practices and project decisions.
 - Recent court decisions and orders clearly highlight major flaws within the MRP and the YVP that are likely to be carried over to the TRP and the TMP.
 - Mistakes with the MRP and YVP have cost the taxpayer millions of dollars, as well as untold damage in the areas of public goodwill and loss of time and productivity in both the public and private sectors.
 - Attempting to recover from the recent court MRP decisions, while undertaking the TRP and TMP, will severely impact the public's ability to responsibly participate in the TRP and the TMP process.
- Please do not close the TMP scoping period until the draft TRP alternatives has been developed and publicly reviewed.
 - The TRP has precedence over implementation and will therefore shape views and comments related to the TMP. I agree that scoping input on the TMP will yield important considerations for the TRP. Parallel scoping periods for the two plans will strengthen the TRP. I do not accept, however, that scoping for the TMP can be completed until at least the TRP alternatives have been drafted.
 - Closing the TMP scoping period at the same time the scoping period for the TRP is closed in response to consideration for the public's time (as was the reason given during a public scoping session) is laudable, but ignores the reality of dependencies and impacts. The scoping period for the TMP needs to be continued until the depth and breadth of the TRP is understood.
- Please include the Hetch Hetchy Reservoir portion of the river within the TRP.

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Tuolumne River and Meadows Plans Scoping Comments – Sugar Pine Ranch

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- Even though it is not included within the wild and scenic portion of the river, it is nonetheless a dynamic segment within Yosemite National Park and both upstream and downstream from river elements (segments) that are within the plan's scope.
- There are economic, environmental, social and political forces centered on Hetch Hetchy that can (and will most likely) have a significant impact upon the Tuolumne River sections being considered within the TRP.
- Since the Wild and Scenic River Act requires the TRP, and given that the Tuolumne River was designated as such in 1984, please baseline the data used in studies and decisions from 1984, and accurately define the various segments being studied and planned.
 - Short of adequate methodologies and scientific processes to collect and analyze data, the condition of the river and its corridor should be determined at the time of Wild and Scenic designation.
 - Each segment of the river should be precisely defined so as to create a clear beginning and end of the segment, e.g., from – to, i.e., entire Lyell Fork drainage to Dana Fork confluence; Dana Fork from eastern park boundary to Tuolumne Meadows; Tuolumne Meadows from Dana Fork and Tuolumne River confluence to Grand Canyon of the Tuolumne; Grand Canyon of the Tuolumne from Tuolumne Meadows to Hetch Hetchy reservoir.
 - Clean up the issue with a proper designation of the headwater drainage of the Dana Fork.
- Please develop all overlays in considering alternatives and impacts that balance natural, cultural and financial assets under the priority of the Organic and Wild and Scenic River Acts to protect and conserve for “nondestructive” recreation and enjoyment.
 - Describe and analyze entire capital infrastructures (e.g., parking, transportation, drinking water distribution, wastewater treatment and collection, year-round accessibility vs. current practice, visitor data collection, local and park revenue opportunities, emergency services, visitor information and education services, lodging/overnight services, food services, fuel and vehicle repair services, public protection, entrance fee administration (throughput), park asset maintenance and upkeep, service excellence and revenue enhancement measures, etc.)
 - Separate that which is essential for priority administration (protection, conservation and preservation of natural and cultural resources vs. enjoyment and revenue generation.
- Also, please designate all capital assets prone to natural and destructive influences, along with anticipated actions should specific impacts to the asset occur; show assets as essential, desirable or nice to have, and designate priority treatment of those assets in the event of natural disasters or insufficient funding for adequate and proper operation/maintenance.

Sincerely,


Craig Maxwell

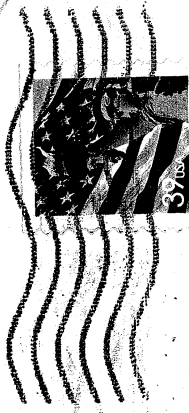
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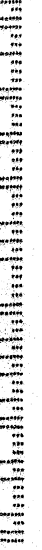
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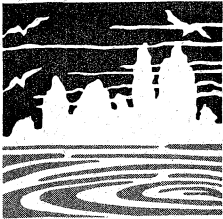
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Michael Tollefson, Superintendent
Yosemite National Park
P.O. Box 577
Yosemite, CA 95389

35389+0577





MONO LAKE

COMMITTEE

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Lee Vining, CA 93541

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September 6, 2006

Superintendent
Yosemite National Park
Attn: Tuolumne Planning
PO Box 577
Yosemite, CA 95389

Dear Superintendent:

Re: Scoping Comments for the Tuolumne River Plan and the Tuolumne Meadows Plan

The Mono Lake Committee (MLC) appreciates the opportunity to provide written comments in advance of alternatives being developed for both the *Tuolumne Wild and Scenic Comprehensive Management Plan* and the *Tuolumne Meadows Plan*. MLC staff attended the informational scoping meeting held in Lee Vining on July 19 and have reviewed the available materials.

The Mono Lake Committee is a non-profit citizen's group dedicated to protecting and restoring the Mono Basin ecosystem, educating the public about Mono Lake and the impacts on the environment of excessive water use, and promoting cooperative solutions that protect Mono Lake and meet real water needs without transferring environmental problems to other areas. The Mono Lake Committee has 15,000 active members.

While the Mono Lake Committee's primary area of focus is the Mono Basin we feel it is important to share our expertise and perspective as this planning process proceeds. Many people that visit Mono Lake also visit the Tuolumne Meadows area on their way to Yosemite Valley and beyond. Because the Mono Lake Committee serves as Lee Vining's Chamber of Commerce and is a primary visitor information location, we have collective information that will help in this planning process. In addition, the MLC is an active member of the Mono Basin Regional Planning Advisory Committee and is able to offer suggestions related to planning issues that may ultimately affect Lee Vining as a gateway community.

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Because the two Tuolumne planning processes are intricately linked and the areas naturally overlap, the Committee offers the following general comments to assist in the development of the two specific plans:

Water Quality

Currently, the Tuolumne River is characterized as having exceptional water quality, especially at the headwaters. The plans should focus on prioritizing maintaining this exceptional water quality both from an ecological perspective and for domestic water supply reasons. Maintaining high water quality standards throughout the state has increasingly become a struggle, and the plan should proactively analyze and address this issue.

Specific actions to consider include:

- Developing a comprehensive water education component that educates the public on the importance of water quality and the impacts of their actions while visiting Tuolumne (for example, correct sanitary procedures if away from restroom facilities). Water conservation should be a component of this education as many visitors are from the Bay Area and it is an opportunity to directly connect them to their water source.

Habitat Values

Tuolumne Meadows, Dana Meadows, and the meadows along the Lyell Fork comprise one of the most extensive subalpine meadow / wetland complexes in the Sierra Nevada. These meadows support a wide variety of plant and animal species, including special-status species. Recognizing that balance is needed when planning for visitor access will be critical to maintaining these important habitat areas.

Specific actions to consider include:

- Routing visitor access points and trails away from certain meadow areas that are sensitive or have been determined to be exceptionally important for specific species.
- Critically analyzing the real need for additional visitor services such as increasing restroom facilities, expanding parking areas, or adding additional buildings. If the visitor needs are the primary focus and not balanced appropriately with maintaining this fragile and unique landscape, then over time, the cumulative impacts of planning decisions and increased visitation will begin to have serious adverse affects on the landscape.
- Again, an education component is critical. Many visitors to Tuolumne Meadows are not versed in wilderness ethics or how to behave appropriately in this type of place. Basic knowledge related to Leave No Trace ethics and how to interact (or rather, not interact) with wildlife should be included. Generally trying to convey a sense of respect for nature is paramount.

Socio-economic Values

Staff housing appears to be an issue that will be addressed in some way through this planning process. The Mono Lake Committee urges planners to include alternatives that

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maintain the existing unique character of Tuolumne Meadows while still providing facilities for employees and guests.

Specific actions to consider include:

- Housing structures are not needed year-round and thus seasonal housing structures make sense as a way to reduce the permanent structure footprint. In addition, using tent cabins helps emphasize a message to visitors that Tuolumne is a sensitive area and that the Park Service is acknowledging this by its own actions.
- Lee Vining is currently experiencing a shortage of available housing for its own residents. Any exploration of having Park Service housing in Lee Vining should be discussed and coordinated with the Mono Basin Regional Planning Advisory Committee in advance of finalizing such a decision.

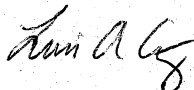
Parking areas should not be expanded as presumably the meadow areas would suffer at the increase of use. Rather than implement quotas for various uses, consider using parking availability as a self-limiting mechanism for controlling access. This is done in many other areas of the Sierra and is generally quite effective. Population numbers and visitor-use demands will always continue to increase. The cumulative impacts to continually responding to public demand for more parking will never cease and will only serve to fragment this habitat further.

Specific actions to consider:

- Implementing a more comprehensive shuttle service that meets the needs of visitors requiring access. Not all visitors will use this service but it is a way to bridge the gap between not adding additional parking areas and taking no action.
- When possible avoid increasing the amount of paved surfaces both for ecological reasons and visitor experience of place.

Thank you for the opportunity to share our concerns and contribute to this planning process. We look forward to reviewing plan alternatives once they are completed. We also request that the MLC be kept informed on any planning process specific to the town of Lee Vining or the interaction between the Mono Basin and Tuolumne Meadows area.

Sincerely,

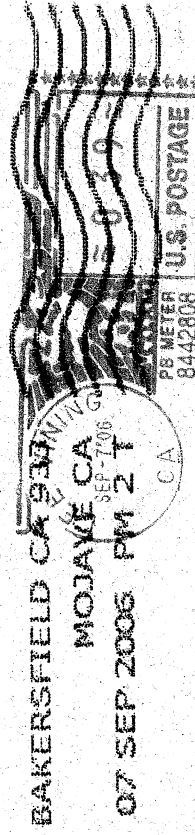


Lisa Cutting
Eastern Sierra Policy Director



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